

Issue Date
June 3, 2004
Audit Case Number 2004-PH-1008

TO: Frances Bush, Director, Office of Community Planning and Development, 3GD

mi Cotemme

FROM: Daniel G. Temme, Regional Inspector General for Audit, Mid-Atlantic, 3AGA

SUBJECT: Safe Haven Outreach Ministry, Incorporated Washington, DC

INTRODUCTION

We audited the Safe Haven Outreach Ministry, Incorporated's (Safe Haven) management and accountability of U.S. Department of Housing and Urban Development (HUD) funds. We performed the audit at the request of HUD's Office of Community Planning and Development in Washington, D.C. In this regard, we reviewed Safe Haven's management and accountability over funds HUD provided it under three programs: Housing Opportunities for Persons with AIDS, Supportive Housing Program, and Shelter Plus Care. Our objective was to determine if the Safe Haven Outreach Ministry, Incorporated expended program funds in accordance with HUD policies and procedures and within the terms and condition of their grant agreements.

To accomplish our objective, we interviewed responsible staff from the Safe Haven Outreach Ministry, Incorporated and HUD's Office of Community Planning and Development. We also reviewed federal regulations governing the programs and Safe Haven's local policies and procedures. In addition, we reviewed supporting documents and records pertaining to the expenditures of the three programs to include accounting records, invoices, receipts, payroll records, grant agreements, and grant applications.

We conducted the audit from October 2003 through May 2004. The audit covered the period between June 1997 and January 2002, and was extended when necessary. We performed the audit in accordance with generally accepted government auditing standards.

In accordance with HUD Handbook 2000.6 REV-3, within 60 days please provide us, for each recommendation without a management decision, 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 unnecessary. Additional status reports are required at 90 and 110 days after report issuance for any recommendation without a management decision.

Should you or your staff have any questions, please contact Mr. John Buck, Assistant Regional Inspector General for Audit, at (215) 656-3401, extension 3486.

SUMMARY

The Safe Haven Outreach Ministry, Incorporated did not always administer U.S. Department of Housing and Urban Development funds in accordance with grant applications and other federal requirements. In this regard, it failed to maintain adequate accountability over funds HUD provided under three programs: Housing Opportunities for Persons with AIDS; Supportive Housing Program; and Shelter Plus Care. This occurred because Safe Haven did not have an effective or organized accounting or filing system. In addition, Safe Haven officials were unaware of applicable federal and contractual requirements of the programs. As a result, responsible officials could not substantiate how they spent \$1,160,873 in federal funds intended to improve the quality of life for homeless persons in the District of Columbia, particularly those coping with the emotional and physical hurdles due to mental illness, HIV/AIDS, and a history of substance abuse. In addition, our audit identified officials spent \$3,977 in HUD funds on ineligible activities such as movie tickets, cigarettes, Christmas gifts, and weekly bingo games.

BACKGROUND

Safe Haven Outreach Ministry, Incorporated is a 501(c)(3) nonprofit multi-service corporation, located at 1140 North Capitol Street, Washington, DC. It provides inpatient and outpatient substance abuse treatment, primary medical care, mental health, case management, housing and other supportive services to single, dual and multiple diagnosed clients. Safe Haven's stated mission is to improve the quality of life for homeless persons in the District of Columbia, particularly those coping with the emotional and physical hurdles due to mental illness, HIV/AIDS, and a history of substance abuse. Its stated goal is to promote for these individuals a life with dignity, security and self-determination. In addition to the three HUD funded programs previously mentioned, Safe Haven has several non-HUD funded programs.

In Fiscal Year 2001, as a result of complaints and concerns regarding Safe Haven Outreach Ministry, Incorporated's grant administration, HUD instructed the city to strengthen its oversight of the organization's financial management. HUD further instructed the city to perform an audit of the organization's financial activities related to HUD funded programs. In HUD's view, the city's resulting audit report did not adequately address its concerns. Therefore, HUD conducted its own on-site monitoring review. HUD's monitoring review concluded the organization did not have an adequate financial management system and it lacked adequate management controls, and did not maintain adequate documentation to justify its expenditures. Safe Haven Outreach Ministry, Incorporated currently has no access to HUD funds.

		Data	Disbursed as of	
the following gra	- '		 ,,,	

During our audit period, HUD funded Safe Haven Outreach Ministry, Incorporated under

Program Area	Project Number	Date Awarded	Authorized	Disbursed as of 9/25/03	Balance
Housing					
Opportunities for					
Persons with AIDS	DCH99-0033	03/03/00	\$1,286,000	\$1,025,673	\$260,327
Supportive Housing					
Program	DC39B960006	08/18/97	\$ 721,309	\$ 721,308	\$ 1
DC39C97-					
Shelter Plus Care	0010-01	09/28/98	\$ 365,400	\$ 205,963	\$159,437
TOTA	ALS		\$2,372,709	\$1,952,944	\$419,765

HUD's Office of Inspector General had not completed any prior audits on Safe Haven Outreach Ministry, Incorporated.

FINDING

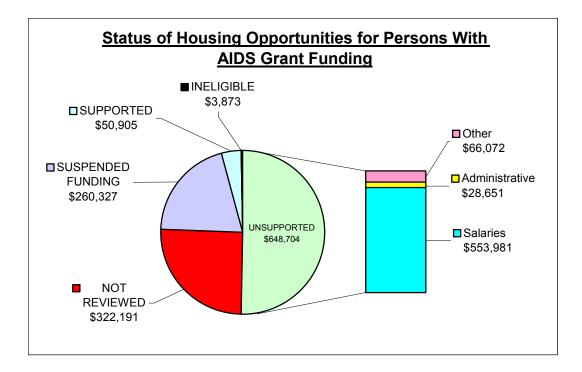
SAFE HAVEN OUTREACH MINISTRY, INCORPORATED COULD NOT SUBSTANTIATE HOW IT USED THE MAJORITY OF ITS HUD FUNDS

Contrary to federal requirements, Safe Haven Outreach Ministry, Incorporated failed to maintain adequate documentation to support withdrawals it made from three grants we reviewed: Housing Opportunities for Persons with AIDS; the Supportive Housing Program; and the Shelter Plus Care Program. In addition, Safe Haven Outreach Ministry, Incorporated officials charged ineligible activities to both the Housing Opportunities for Persons with AIDS grant and the Supportive Housing Program grant. This occurred because Safe Haven did not have an effective or organized accounting system or filing system. In addition, Safe Haven officials were unaware of applicable federal and contractual requirements of the programs. As a result, officials could not support \$1,160,873 of the \$1,618,149 (72-percent) of HUD funds we reviewed for the three grants. Officials also charged \$3,977 in ineligible activities to the Housing Opportunities for Persons with AIDS and the Supportive Housing Programs.

Safe Haven Outreach Ministry Could Not Substantiate How It Spent the Majority of Its Housing Opportunities for Persons With AIDS Funds

Safe Haven Outreach Ministry could not adequately support \$648,704 of the \$703,482¹ (92-percent) in Housing Opportunities for Persons With AIDS Program expenditures we reviewed under the audit. In addition, officials spent another \$3,873 in grant funds on ineligible activities such as movie tickets, cigarettes, Christmas gifts, and weekly bingo games.

HUD established the Housing Opportunities for Persons with AIDS Program to address the specific needs of persons living with HIV/AIDS and their families. The program offers grants to local communities, states, and nonprofit organizations to provide housing assistance, and related supportive services. Safe Haven Outreach Ministry, Incorporated received a total of \$1,286,000 in funding under the program and it expended \$1,025,673 to date. However, HUD froze the remaining \$260,327 in January 2002 due to its concern about the organization's apparent financial mismanagement. The following graph shows the total grant award and it details the amounts we found supported, unsupported and ineligible.



¹ Safe Haven Outreach Ministry, Incorporated was the Housing Opportunities for Persons With AIDS grantee and it received these funds directly from HUD.

Salaries and Fringe Benefits

We reviewed 100-percent of the salaries and fringe benefits officials charged to this grant totaling \$553,981 and found that it was all unsupported. OMB Circular A-122, Cost Principals for Nonprofit Organizations, Attachment B requires nonprofit organizations to support distributions of salaries and wages to federal awards by appropriate personnel activity reports which reflect an after-the-fact determination of the actual activity of each employee. Safe Haven Outreach Ministry, Incorporated did not do so. Instead, they told us they allocate employees' time based on funding received from the grants or on estimated percentages of employees' time spent on the grant. We found there were a total of 31 people who were employed during the grant period and 17 of them completely charged their time to this grant. Most of these individuals were employed as counselors. We attempted to interview the 17 employees who completely charged their time to this grant to verify that they in fact worked 100-percent on this grant. However, we were only able to interview one out of the 17 employees because Safe Haven no longer employed the other 16 employees. This one individual told us he could not remember if he worked solely on this grant, or on several of the Safe Haven's grants. Nevertheless, since Safe Haven officials did not require their employees to keep daily personnel activity reports in violation of federal requirements, we consider all of these salaries and fringe benefits to be unsupported.

Administrative Costs

We reviewed 100-percent of the administrative costs for the grant period totaling \$28,651 and found the Safe Haven Outreach Ministry, Incorporated did not maintain any documentation to support these costs. Federal regulations (Title 24 CFR 84.21) state a grantee must maintain complete and accurate grant records identifying the source and application of grant funds and ensure that grant expenditures are supported by source documentation and used solely for authorized purposes. However, during our audit, the Executive Director stated that her organization maintains no support for administrative costs because she believed maintaining records for an administrative cost was not required.

Other Costs

Safe Haven could not support the majority of other expenditures we reviewed under this grant. OMB Circular A-122, Attachment A, Paragraph A, subparagraph 2(g) states that to be allowable under an award, costs must be adequately documented. Title 24 CFR 84.21 further states that grantees must ensure that grant monies are supported by source documentation and used solely for authorized purposes. We selected a non-statistical sample of expenditures from the remaining \$444,709 in grant funds to determine if expense had supporting documentation such as invoices, receipts, and cancelled checks, and to determine if they were eligible under this grant. We selected the highest dollar value from each cost category in the general ledger for calendar years 2000 through 2003.

Of the \$120,850 sampled expenditures, we determined that Safe Haven could not support expenditures totaling \$66,072 (55-percent). We found that a majority of the files did not include support such as invoices, receipts and/or cancelled checks as required. For example, we found officials could not provide support for expenditures such as food for clients, medical supplies, consultants, and building maintenance. The Executive Director acknowledged during the audit that Safe Haven does not have an organized filing system and she stated that all records are in boxes in no particular order. She further stated however, she now will ask the staff to organize it.

Ineligible Expenditures

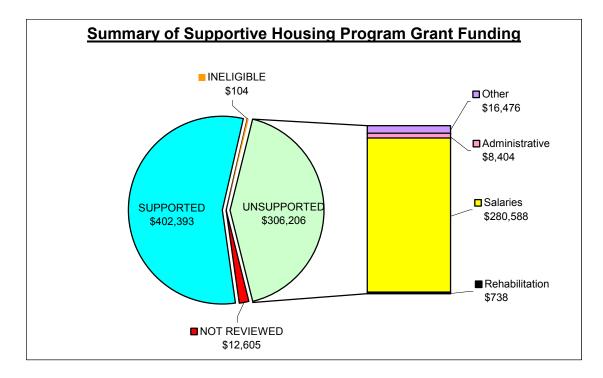
Safe Haven Outreach Ministry, Incorporated charged tickets to a movie theater, cigarettes, Christmas gifts and decorations, weekly bingo games and other activities not eligible under this grant totaling \$3,873. OMB Circular A-122, Attachment A, Section 3, states that costs must be reasonable and necessary. The Circular further states in Section 14 under Attachment B, that entertainment costs are unallowable. Additionally, these activities are not allowable under the grant agreement or other federal regulations (Title 24 CFR 574.300).

Safe Haven Outreach Ministry Could Not Substantiate How It Spent All Supportive Housing Program Funds

Our review of $$708,704^2$ of \$721,309 in Supportive Housing Program expenditures showed that responsible officials could not substantiate how they used \$306,206 (43-percent) of this funding. Also, officials spent \$104 in grant funds on ineligible activities such as movie tickets, and novelty items.

Title IV of the Stewart B. McKinney Homeless Assistance Act authorizes the Supportive Housing Program. The program is designed to promote the development of supportive housing and supportive services, including innovative approaches to assist homeless persons in the transition from homelessness and to promote the provision of supportive housing to homeless persons to enable them to live as independently as possible. Safe Haven received a total of \$721,309 under the Supportive Housing Program as of August 1997 and expended all but one dollar. The below chart shows the total grant award detailing the amounts we found supported, unsupported and ineligible.

² Safe Haven Outreach Ministry, Incorporated was the Supportive Housing sponsor, and it received these funds through the grantee, an organization known as the Community Partnership for the Prevention of Homelessness. We did not review \$12,605 paid to the grantee to cover its administrative costs.



Salaries and Fringe Benefits

We reviewed 100-percent of salaries and fringe benefits officials charged to this grant for 18 employees, totaling \$280,588 and found it was all unsupported. As stated previously, OMB Circular A-122, Cost Principals for Nonprofit Organizations, Attachment B requires nonprofit organizations to support distributions of salaries and wages to federal awards by appropriate personnel activity reports, which reflect an after-the-fact determination of the actual activity of each employee. Here again, Safe Haven Outreach Ministry, Incorporated did not do so. As with their other grants, officials said they allocate employees' time based on funding received from the grants, or on estimated percentages of employees' time spent on the grant and not actual hours worked. Safe Haven officials did not require their employees to keep daily personnel activity reports in violation of federal requirements.

Administrative Costs

We reviewed 100-percent of administrative costs for the entire grant period totaling \$8,404 and here again found Safe Haven did not maintain any documentation to support these costs. Federal regulations (Title 24 CFR 84.21) state a grantee must maintain complete and accurate grant records identifying the source and application of grant funds and ensure that grant expenditures are supported by source documentation and used solely for authorized purposes. However, during our audit, the Executive Director stated that her organization maintains no support for administrative costs because she believed maintaining records for an administrative cost was not required.

Other Costs

We reviewed \$419,712 of the remaining \$432,317 expenditures charged to the grant to determine if the grantee could support the expenditures. We determined Safe Haven could support all but \$17,214 (4-percent) of the expenditures. As stated previously, OMB Circular A-122, Attachment A, Paragraph A, subparagraph 2(g) states that to be allowable under an award, costs must be adequately documented. 24 CFR 84.21 further states that grantees must ensure that grant monies are supported by source documentation and used solely for authorized purposes.

Specifically, we found that officials could not support \$738 of costs it incurred during its October 1996 acquisition and rehabilitation of a facility used to house clients known as Buckmon House. Also, responsible officials could not provide support such as invoices, receipts and/or cancelled checks to substantiate \$16,476 in supportive services and operating costs such as utilities and food for its clients. Here again, the Executive Director acknowledged during the audit that Safe Haven does not have an organized filing system and she stated that all records are in boxes in no particular order. She further stated however, she now will ask the staff to organize it.

Ineligible Expenditures

Safe Haven Outreach Ministry, Incorporated charged tickets to a movie theater and ineligible novelty items totaling \$104 to this grant. As stated previously, OMB Circular A-122, Attachment A, Section 3, states that costs must be reasonable and necessary. The Circular further states at Section 14 under Attachment B, that entertainment costs are unallowable. Additionally, these activities are not allowable under the grant agreement or other federal regulations (Title 24 CFR 574.300).

Safe Haven Outreach Ministry Could Not Substantiate How It Spent Any Shelter Plus Care Funds

Safe Haven could not provide support for any of the \$205,963 it received from this grant. The Shelter Plus Care program is authorized by title IV, subtitle F, of the Stewart B. McKinney Homeless Assistance Act. It is designed to link rental assistance to supportive services for hard-to-serve homeless persons with disabilities. Individuals primarily assisted should be those who are seriously mentally ill; have chronic problems with alcohol, drugs, or both; or have acquired AIDS and related diseases.

We found that as of August 2002, Safe Haven Outreach Ministry, Incorporated received \$205,963³ from this grant. However, responsible Safe Haven officials could only provide us with general ledgers covering the period January 2000 through December 2001. The available general ledger contained 104 transactions valued at \$102,885 or about 50-percent of the \$205,963 in HUD funds officials received under this grant. The Executive

³ Safe Haven Outreach Ministry, Incorporated was the Shelter Plus Care sponsor, and it received these funds through the grantee, an organization known as the DC Department of Health, Agency for HIV/AIDS.

Director informed us that regrettably, Safe Haven did not have possession of all of the general ledgers because the former accountant took them when the accountant resigned from Safe Haven.

We audited 20 of 104 transactions (every fifth transaction) on the available general ledger and found that responsible officials could not provide support such as invoices, receipts and/or cancelled checks to substantiate any of the 20 transactions audited valued at \$15,324. Since Safe Haven's available general ledger covered only half of the HUD funds it received, and for the transactions they did record they did not have an adequate system in place to maintain invoices, receipts and/or cancelled checks required by OMB Circular A-122, we consider the entire \$205,963 unsupported. Since Safe Haven could not substantiate how it spent any of its Shelter Plus Care funds there is no assurance that it used these funds to attain the goals of this program.

AUDITEE COMMENTS

We discussed the draft findings with Safe Haven personnel during the audit, and at the exit conference with the Executive Director on May 20, 2004. Safe Haven provided written comments to our draft findings on May 26, 2004. In its response, Safe Haven acknowledged it needed to improve its financial management system. It stated that in April 2001, its Certified Public Accounting firm also reported that it was overspending, underreporting short-term liabilities, and making numerous posting errors. Safe Haven further acknowledged that its employee time reporting procedures were not in accordance with federal regulations. However, Safe Haven stated that most of the problems our audit identified were due to errors its previous accounting staff made, and it has already terminated or asked these employees to resign. In addition, it stated it could now substantiate most of the costs our audit identified as unsupported. As such, Safe Haven asked us to reconsider most of the ineligible and unsupported costs we found during our audit. Safe Haven further stated it would like HUD to help it develop a system to properly allocate its costs.

OIG EVALUATION OF AUDITEE COMMENTS

We considered Safe Haven's comments in preparing the final report and included the full response as Appendix B. We are encouraged that Safe Haven acknowledged the management control weaknesses our audit identified, and has begun taking actions to strengthen its management controls. However, although Safe Haven believes that most of its accounting problems were due to its previous accounting staff, we believe it still has significant room for improvement. Additionally, although Safe Haven stated it could now substantiate most of the costs our audit identified as unsupported, it did not provide this documentation during our audit period. If these expenditures remain unsupported, Safe Haven should reimburse HUD for the expenditures from non-federal funds. Lastly, we considered Safe Haven's views of expenses we considered ineligible and continue to believe these expenses are ineligible.

RECOMMENDATIONS

We recommend that HUD:

1A. Initiate appropriate administrative actions against current and/or former members of the Board of Directors, Executive Committee and other responsible officials of the Safe Haven Outreach Ministry, Incorporated.

We further recommend that HUD require Safe Haven Outreach Ministry, Incorporated to:

- 1B. Provide adequate documentation to support all salaries and fringe benefits paid from HUD funds. If the grantee is not able to provide adequate documentation, require them to reimburse HUD \$834,569 from non-federal funds (Housing Opportunities for Persons with AIDS \$553,981; Supportive Housing Program \$280,588).
- 1C. Provide adequate documentation to support all administrative costs. If they are not able to provide the documentation, require them to reimburse HUD \$37,055 from non-federal funds (Housing Opportunities for Persons with AIDS - \$28,651; Supportive Housing Program - \$8,404).
- Provide adequate documentation to support remaining unsupported expenditures. If they are not able to provide the documentation, require them to reimburse HUD \$289,249 from non-federal funds (Housing Opportunities for Persons with AIDS -\$66,072; Supportive Housing Program - \$17,214; Shelter Plus Care -\$205,963).
- 1E. Reimburse HUD \$3,977 for ineligible costs from non-federal funds (Housing Opportunities for Persons with AIDS \$3,873; Supportive Housing Program \$104).
- 1F. Develop a policy to maintain adequate time distribution records that are activity specific, to support salaries and fringe benefits charged to any future HUD awards.
- 1G. Develop an effective system for adequately documenting and accounting for any future expenditure of HUD funds.

MANAGEMENT CONTROLS

Management controls include the plan of organization, methods, and procedures adopted by management to ensure that its goals are met. Management controls include the processes for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance.

We determined policies, procedures, control systems, and other management tools implemented to ensure Safe Haven Outreach Ministry, Incorporated appropriately expended project funds were relevant to our audit objectives. It is a significant weakness if management controls do not provide reasonable assurance that the process for planning, organizing, directing, and controlling program operations will meet an organization's objectives.

Based on our review, we believe the following items are significant weaknesses. Safe Haven Outreach Ministry, Incorporated did not:

- Maintain personnel activity reports to support salaries and wages charged to HUD grant programs,
- Maintain an organized filing system,
- Accurately record expenditures in their General Ledger,
- Maintain adequate documentation to support charges to HUD grant programs, and
- Charge only eligible activities to HUD funded grants.

Appendix A

Recommendation Number	Ineligible Costs 1/	Unsupported Costs 2/
1B		\$ 834,569
1C		\$ 37,055
1D		\$ 289,249
1E	\$ 3,977	
TOTAL	\$ 3,977	\$ 1,160,873

SCHEDULE OF QUESTIONED COSTS

- 1/ Ineligible costs are costs charged to a HUD-financed or HUD-insured program or activity that are not allowable by law, contract or federal, state or local policies or regulations.
- 2/ Unsupported costs are costs charged to a HUD-financed or HUD-insured program or activity and eligibility cannot be determined at the time of audit. The costs are not supported by adequate documentation or there is a need for a legal or administrative determination on the eligibility of the costs. Unsupported costs require a future decision by HUD program officials. This decision, in addition to obtaining supporting documentation, might involve a legal interpretation or clarification of Departmental policies and procedures.

Appendix B

AUDITEE COMMENTS

Believing in the Miracles of Lif

SAFE HAVEN OUTREACH MINISTRY, INC. 1140 North Capitol Street, NW #924 WASHINGTON, DC 20002

Office: 202.589.1505 FAX: 202.589.1534

website: www.safehavenoutreach.org

May 26, 2004

Mr. Daniel G. Temme Regional Inspector General for Audit US Department of Housing and Urban Development Wanamaker Building, Suite 1005 100 Penn Square East Philadelphia, PA 19107-3380

Dear Mr. Temme,

In response to your draft audit memorandum dated May 11, 2004 and the subsequent exit conference held on May 20, 2004, we submit the following:

- The Safe Haven Outreach Ministry, Inc. (SHOM) financial management system, management controls and maintenance of financial documents procedures have been and will continue to be reorganized since December of 2001. In fact, from a fiscal vantage point, SHOM is a different agency since the advent of our current Director of Finance (11/01), Mr. Gabriel Ume.
- 2. SHOM Executive Director and Board of Directors were warned by its new CPA auditing firm in April of 2001 that: a) It had not been adequately made aware of overspending; that the former CPA auditing firm had not noted an underreporting of organization short term liabilities; that he did not believe that the ending income/expense figures for the year ending 2000 could be accurately verified due to numerous errors made in entry postings. The Board investigated these assertions and by October 30,2001, three of the four finance staff members been terminated or asked to resign.
- 3. Whether invoices are required to draw down funds or not, since December 2001, all requests for payment are fully documented (as if invoices to funders are required) and justified by copies of bills and/or expense receipts. In addition all items are properly coded and input into the general ledger.

With respect to specific dollar finding:

1. A. See summary to follow.

1. B. Documentation of salaries account for fully \$834,569 of the \$1,160,873 which the inspector general found "unsupported".

- SHOM utilized a quarterly allocation spreadsheet for staff allocation of expense based on provider funding levels to SHOM. Unfortunately, as you point out, we were not then aware that this was not an acceptable method of salary justification under A-133 standards.
- SHOM would like to work with HUD to reach an agreement with respect to these
 past salary allocations. SHOM can fully support the employment of the individuals
 through time sheets and payroll records. We believe we can also satisfactorily
 demonstrate the HIV status of these consumers in order to satisfy HUD.
- 1. C. With respect to \$37,055 administrative costs:
- The former CFO did not, in many instances, either keep supporting documentation or appropriately allocate salaries and expenses (like audit expense, admin. Supplies, etc.
- 2. We are very sure that we can substantiate administrative expenses.
- 3. We ask HUD to review the administrative expense justifications we wish to submit and, hopefully acknowledge its satisfaction with these submissions. (We also wish to have HUD help us determine how best to allocated mixed expenses (supplies, phone, etc.) in the future.)
- 1. D. Unsupported program expenses-\$289,249.00
- 1. We apologize that the Shelter Plus Care information you reviewed appeared incomplete. The box had previously been set aside after submission to HUD local and it was <u>assumed</u> that all of the information was still intact.
- 2. We would like to resubmit this information to HUD and believe that it should substantiate virtually all S+C expenses.
- 3. We ask HUD to give SHOM a listing of unsupported program expenses (including the 20 S+C transactions audited).
- 4. We ask HUD to allow SHOM to justify these items and further ask HUD to review these submissions for a re-determination of findings in this regard.
- 1. E. "Ineligible" costs of \$3,977
- 1. SHOM does not dispute that cigarettes are ineligible and that we must reimburse HUD any costs for such items. Please give us that figure.
- 2. SHOM submits that movie tickets and bingo games are recreation items for clients who are largely confined in an inpatient treatment program, not entertainment as interpreted and, as such, we ask for review of this finding.

SHOM submits that Xmas gifts was an inaccurate label by accounting. Items
purchased were client costs items such as toiletries, underwear, gloves, etc., which
were simply wrapped during the Xmas season. SHOM asks reconsideration of these
items.

1. F. SHOM has developed the attached method of time distribution which is based on actual program/admin duties or client interaction. The allocation is based on the actual time spent with clients and is based on the client census which is submitted to finance on each as the Saturday on which the pay period ends (see attached).

1. G. SHOM now documents every expenditure and maintains full and complete records of each expense. SHOM would like to work with HUD to determine an acceptable method of allocating certain administrative expenses i.e. the admin staff (for payroll), supplies, phone, etc.

Summary:

SHOM fully understands, and appreciates its past shortcomings in documentation and justification. We assure HUD that these are procedural and not based on actual misspending of HUD dollars.

We believe that administrative actions (section 1A) have, in effect already begun by the withholding of HUD funds under the HOPWA grant and we further hope that HUD finds-through our submission of supporting documentation- that we responded to questions of expense support. We have remediated our financial management procedures in terms of salary allocations and proper justification expenses and costs with respect to filing and maintaining documentation. I have directed staff to spend every spare moment reorganizing old financial files (sent over from our old administrative HQ without order) so that they are easily accessible and well ordered.

We very sincerely and earnestly regret the government's expense in this lengthy and costly process. We believe however, that the cost may be well spent as SHOM emerges as a well administered, financially accountable provider of services to the underserved populations we are dedicated to serve.

Sincerely,

Marshe Ce. Lich

Marsha A. Richerson, Executive Director

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Staft Haven C Staff Name: Day of bate Week Date Week Date Fri San Mon Mon Tues Week One: Day Date Day Date Neek Two Total Hotu Total Hotu	Safe Haven Outreach Ministry, Inc Time Allocation Worksheet Pay Period Ending:	The Total Finance Office Use Only	International Activity Funding Sources	ACLIVILY / VA STEP CS PSA SP Description					Total Hrs, Total (Funding) Hrs,	In Out Total Artivity / Funding Sources	Veek Two: D				: Total Hrs. Total (Funding) Hrs.	s: Weeks 1& 2 Grand Totals Grand Totals	Note: All days must add-up to a minimum of 8 hours (Not including lunch) Begin Ball: Earned: Used: Ball.	OSA = CS CSOSA/SPNS = CS/SP Sick Leave = S/L Ad-min = Administrative Staff Only	PSA/SPNS = PSA/SP Annual Leave = A/L	CDC = CDC Comp Time = C/T Finance Office Use	
	in Outreach Minis	<u> </u>			Week One:			-	Week One: Total Hrs.	⊢	Veek Two:				 Week Two: Total Hrs.	Total Hours: Weeks 1& 2	Note: All days	CSOSA = CS	PSA = PSA	SPNS = SP	