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Audit Memorandum
98-SE-204-1003

July 2, 1998

MEMORANDUM FOR: Lynn Martin, Director, Office of Public Housing,
Washington State Office, OAPH

FROM: David J. Niemiec, Acting District Inspector General for Audit,
Northwest/Alaska District, OAGA

SUBJECT: King County Housing Authority
Public Housing Drug Elimination Program
Seattle, Washington

As part of a multi-district review of the Public Housing Drug Elimination Program (Drug Elimination Program), we conducted an audit of the King County Housing Authority's (Housing Authority) Drug Elimination Program for Fiscal Years 1994 through 1996. We were to select two public housing authorities - one designated as "troubled", the other "non-troubled" - for the review. However, there were no "troubled" public housing authorities in the Northwest/Alaska Office's jurisdiction, so we did not include a "troubled" public housing authority in our review. We selected King County Housing Authority, "non-troubled", because HUD had given this entity the highest rating in the Northwest/Alaska Office jurisdiction for its capacity to carry out the program. In addition, the Housing Authority received the second highest amount of program funding in the jurisdiction. The purpose of our review was to determine whether the Housing Authority:

1. Implemented its Drug Elimination Program awards for Fiscal Years 1994 through 1996 with satisfactory outcomes/benefits in accordance with its plans;
2. Submitted required Drug Elimination Program reports in a timely manner; and
3. Expended Drug Elimination Program funds for only eligible activities in accordance with applicable Notices of Funding Availability (NOFA) for Fiscal Years 1995 and 1996.

We found that the Housing Authority implemented Drug Elimination Program awards for Fiscal Years 1994 through 1996 with satisfactory outcomes/benefits in accordance with its plans. Specifically, the Housing Authority identified and analyzed drug-related crime problems at its targeted developments (Attachment II); planned activities to address identified problems; implemented planned activities; and developed a process to measure performance and demonstrate program outcomes in accordance with its plans. Although we found that crime statistics were inconclusive, residents told us that they feel safer in their communities as a result of drug elimination efforts. In addition, the Housing Authority submitted required semi-annual and final performance and financial reports in a timely manner, and only expended funds on eligible activities. Accordingly, we are not making any recommendations. The results of our review are detailed in Attachment I.

We provided a draft copy of this memorandum to the Executive Director of the Housing Authority in May 1998, and received comments on the draft memorandum on June 5, 1998. The Executive Director agreed with the audit results and stated that he believes the memorandum accurately reflects the Housing Authority's program. His comments are included as Attachment III. On June 9, 1998 we met with you to discuss the results of this audit, and an exit conference was held at the Housing Authority's central offices on June 9, 1998.

If you have any questions, please contact Robert Woodard or Ron Jilg at (206) 220-5360.

4 Attachments

Attachment I	Results of Review
Attachment II	Targeted Developments
Attachment III	Auditee's Comments
Attachment IV	Distribution

RESULTS OF REVIEW

Background

The Drug Elimination Program has three purposes:

1. To eliminate drug-related crime and problems associated with it;
2. To encourage public housing agencies and resident management corporations to develop long-term plans for addressing these issues; and
3. To make Federal grants available to these organizations to carry out these plans.

To receive Drug Elimination Program funding, housing authorities submit a grant application to HUD in response to a Notice of Funding Availability (NOFA). HUD evaluates the applications received and awards available funding to the housing authorities with the highest ratings. HUD develops the ratings by assigning points to the applications based on the criteria in the NOFA. HUD evaluates applications on the basis of four selection criteria:

1. The extent of drug-related crime in or around the developments targeted for funding;
2. The quality of the housing authority's long-term plan to address the crime problem at these developments;
3. The applicant's capability to carry out its plan; and
4. The extent to which tenants, the local government, and the local community support and participate in the design and implementation of proposed Drug Elimination Program activities.

The Housing Authority began receiving Drug Elimination Program grants in 1991. The Housing Authority's 1994 and 1995 drug elimination programs included 11 housing development projects (1,669 units). In 1996, one project was dropped from the application. To implement its Drug Elimination Program activities, the Housing Authority developed a "Working Together" concept. Under this concept, resident organizations, management, law enforcement, and human services teams would have a forum to develop action plans to make healthier and safer neighborhoods. Under program rules, the Housing Authority has staffed a Drug Elimination Coordinator position for the past six and a half years.

For the years reviewed, the Housing Authority received Drug Elimination Program funding as follows:

Fiscal Year	Drug Elimination Program award	Disbursed (as of 5/6/98)	Remaining Balance
1994	\$ 777,750	\$ 777,750	\$0
1995	\$ 784,250	\$ 784,250	\$0
1996	\$ 791,250	\$ 791,250	\$0
Totals	\$ 2,353,250	\$ 2,353,250	\$0

Of the total \$2,353,250 awarded, the Housing Authority spent the following:

- \$981,165 (42 percent) for law enforcement services;
- \$1,114,912 (47 percent) for drug prevention activities;
- \$97,571 (4 percent) for drug intervention activities;
- \$106,200 (5 percent) for drug treatment activities; and
- \$53,402 (2 percent) for other program activities.

Audit Objectives, Scope, and Methodology

We reviewed the Housing Authority's planning and implementation of its Drug Elimination Program grants for Fiscal Years 1994 through 1996 to determine if the Housing Authority obtained satisfactory outcomes/benefits in accordance with its plans. To achieve our objectives, we performed the following audit procedures:

- ◇ We identified and reviewed applicable NOFAs, regulations, and other criteria to identify eligibility requirements for the Drug Elimination Program.
- ◇ We obtained the Housing Authority's Drug Elimination Program applications/plans for Fiscal Years 1994 through 1996 to determine whether (a) the Housing Authority properly identified, analyzed, and reported drug-related crime problems at the targeted developments, and (b) the plans adequately addressed reported crime problems. To ensure that crime data reported to HUD were reliable, we obtained police-generated data, which we compared on a sample basis to Outcome Monitoring Reports submitted to HUD.

- ◇ We interviewed Housing Authority staff and reviewed appropriate documents and Drug Elimination Program plans to gain an understanding of the Housing Authority's system for collecting and analyzing data, and for monitoring program effectiveness.
- ◇ Using Semi-Annual Outcome Monitoring Reports, we tracked changes in crime statistics for each development under the Drug Elimination Program. For those developments having a downward crime trend, we reviewed available evidence to determine whether this trend was attributable to the Housing Authority's Drug Elimination Program activities. To help analyze crime trends, we also interviewed statisticians at three local police departments providing community policing services at the Housing Authority's targeted developments.
- ◇ We selected and interviewed 23 residents (including 3 resident council members) at 8 of the Housing Authority's 11 targeted developments to determine whether these residents saw a reduction in crime at their developments, and whether they attributed such changes to a particular component of the Housing Authority's Drug Elimination Program.
- ◇ We interviewed appropriate Housing Authority staff and reviewed plans, performance reports, contracts, and billings to determine whether the Housing Authority:
 - implemented the activities it initially planned;
 - reached the intended target population;
 - developed collaborative relationships; and
 - achieved desired program objectives, as described in its plan.
- ◇ We interviewed staff at HUD's Office of Public Housing in Seattle to identify controls for confirming the receipt of the required performance and financial reports, and to restrict drawdown requests if required reports were not submitted in a timely manner.
- ◇ We reviewed required Drug Elimination Program reports to determine whether they were received on time by the HUD Office of Public Housing in Seattle.
- ◇ We selected and reviewed a judgmental sample of about 10 percent of the Housing Authority's Drug Elimination Program expenditures to determine whether they were properly supported and eligible. This sample included at least one transaction for each of the major service providers for two fiscal years. We reviewed invoices and 23 service provider contracts (representing over 50 percent of the funds for Fiscal Years 1995 and 1996). Attached to invoices were

activity narratives and client data which demonstrated the performance of these providers.

Audit work was performed from January through April 1998. The audit covered the period October 1994 through December 1997, and was extended as appropriate. We conducted the audit in accordance with generally accepted government auditing standards.

CONCLUSIONS

The Housing Authority:

1. **Implemented Drug Elimination Program awards for Fiscal Years 1994 through 1996 with satisfactory outcomes/benefits in accordance with its plans,**
2. **Submitted required reports in a timely manner, and**
3. **3. Expended funds on only eligible activities.**

1. The Housing Authority implemented program awards... with satisfactory outcomes and benefits....

The Housing Authority implemented Drug Elimination Program awards for Fiscal Years 1994 through 1996 with satisfactory outcomes/benefits in accordance with its plans. Specifically, the Housing Authority:

- Identified and analyzed drug-related crime problems at its targeted developments;
- Planned activities to address identified problems;
- Implemented planned activities; and
- Developed a process to measure performance and demonstrate program outcomes in accordance with its plans.

Although we found that crime statistics were inconclusive, residents told us that they feel safer as a result of drug elimination efforts.

The Housing Authority identified and analyzed drug-related crimes at targeted developments.

The NOFA requires the Housing Authority, in its application for Drug Elimination Program funds, to identify the extent and nature of drug-related crime at the developments proposed for funding (targeted developments). The application also must provide the best available objective crime data, such as statistics from local law enforcement agencies. In addition, the Housing Authority may submit other supporting data, including information from schools and health service providers. To receive the maximum

available points an application also should provide an analysis of the reported crime data.

We reviewed the Housing Authority's Drug Elimination Program applications for Fiscal Years 1994 - 1996 and found that the Housing Authority identified drug-related crimes at its targeted developments, as required. The Drug Elimination Coordinator (Coordinator) obtained crime statistics—in the form of computer printouts, schedules, and monthly reports—from local police departments having substations at targeted developments. The Coordinator then summarized these statistics for use in Drug Elimination Program applications and performance reports.

We found that the applications identified high rates of drug-related crime at targeted developments in Kent, Auburn, and White Center. For example, the 1994 plan stated that from October 1992 through February 1993, 29 percent of the gang-related calls to the Southwest Precinct of the King County Police Department were from the Park Lake development in White Center. The plan also stated that in 1992 this project had the highest rate of reported crime in King County (outside the City of Seattle).

As allowed by the NOFA, the Housing Authority also reported the following supporting data:

- Drug-related emergency room admissions;
- US Census data showing social and health indicators;
- Recent drug abuse trend data from the Washington State Department of Social and Health Services;
- Overdose death data from the King County Medical Examiner; and
- Statistics on dropout rates and levels of absenteeism from local school districts.

In addition, we reviewed Drug Elimination Program applications to determine whether the Housing Authority analyzed its crime data. We found that the Housing Authority's application included an analysis of crime in surrounding neighborhoods; causes for increases in drug-

related crime; demographic changes affecting crime rates; and the effects of community policing substations and active resident councils on drug-related crime. The Housing Authority also explained the link between drug-related crimes and associated problems (including violence against persons, crimes against property, and crimes to get money for drug purchases).

The NOFA requires the Housing Authority to develop and include in its application a plan for addressing drug-related crime at targeted developments. The plan must also describe resources available to sustain planned activities over a period of years.

The Housing Authority planned activities to address identified problems.

To address identified crime problems, the Housing Authority planned to place community policing substations at targeted developments in three areas: Kent, Auburn, and White Center. These substations were expected to address both drug-related crimes and associated problems, such as emergency medical calls and youth gang involvement. In addition, the Housing Authority planned to contract with service agencies who would provide drug-related prevention, intervention, and treatment programs to complement law enforcement services at these developments.

The Housing Authority planned to fund a computer training center as a drug prevention activity at two Bellevue projects because they had already used other HUD program funds to provide enhanced law enforcement through a police substation at a nearby assisted housing project. This computer center was expected to offer the following benefits to public housing residents:

- Healthy alternative activities for youth and adults;
- Employment training and job readiness preparation;
- Opportunities for children and their parents to share in positive learning; and
- The chance for youth to share their center with neighboring youth, reducing the stigma attached to public housing.

The Housing Authority measured program performance and demonstrated outcomes.

We also found that the Housing Authority established initiatives that can be sustained over several years, given continued Drug Elimination Program funding. Our review showed that the same entities continue to provide services from year to year, and plans state that several entities have made Drug Elimination Program activities a strong priority. For example, the Housing Authority's plans note that Auburn's new police chief is committed to community policing and is currently considering how that concept can be integrated into police services throughout Auburn. In addition, the Housing Authority's plans that the King County Executive and Metropolitan King County Council are very supportive of community policing, and the Springwood substation contract represents the beginning of community policing efforts for the Kent Police Department. Further, the King County Sheriff's Office has published its commitment to community policing at all department levels.

In its Grant Agreements with HUD, the Housing Authority agreed to perform planned services in accordance with its approved Drug Elimination Program application.

The Housing Authority implemented planned activities.

We found that the Housing Authority implemented the activities described in its 1994 - 1996 Drug Elimination Program applications. As noted above, the Drug Elimination Program applications stated that community policing substations would be set up in three areas (Kent, Auburn, and White Center). We found that these substations were established.

The Housing Authority also planned to contract with service agencies who would provide prevention, intervention, and treatment programs at targeted developments. We found that these programs were in place during the periods reviewed. For example, billings from the Ruth Dykeman Center contained narratives about drug prevention activities conducted at the developments. Several residents told us that they were involved in or aware of tutoring programs provided by Neighborhood House, a service provider specified in the Housing Authority's plan. Further, for one of the Bellevue projects we found that the residents we interviewed were aware of the computer center, and billings showed that the center was in operation.

The Fiscal Year 1996 NOFA states that an applicant's plan must show that an evaluation process has been developed

to measure performance and demonstrate results. (The Fiscal Year 1994 and 1995 NOFAs state, more generally, that the success of the applicant's plan should be measured.)

We interviewed Housing Authority staff, and reviewed billing and reporting documents to determine whether the Housing Authority developed a process for measuring performance and demonstrating outcomes in accordance with its plans. We found that the Housing Authority established such an evaluative process. To measure program performance, the Housing Authority requires each service agency to provide a report with its monthly billing that addresses how performance requirements have been met. These reports include a data sheet with objective data on how many individuals were served, the number of businesses contacted, and other appropriate data per the agency contract.

In addition, the Housing Authority's contracts with police departments require police to provide monthly data sheets (based on HUD's model data sheet) along with invoices for payment. These data sheets include the number of foot patrols, car patrols, resident contacts, and other data showing community policing activities. Our interviews of Housing Authority staff and our review of 21 billing documents showed that service agencies and police departments are performing in accordance with their contracts.

To demonstrate program outcomes, we found that the Coordinator summarizes the above performance data, and works with data collection staff at local police departments to get data on calls for service and overall crime levels. The police also provide printouts which the Coordinator uses to identify and analyze crimes pertaining to targeted projects. During the period under review, these program outcomes were reported to HUD in Outcome Monitoring Reports, as well as Semi-Annual and Final Performance reports.

In addition, the Housing Authority conducted resident surveys to help evaluate the performance of the Drug Elimination Program at targeted projects. According to survey summaries and supporting evaluation forms, the results were in general very positive. Residents see

reduced crime and drugs, are supportive of police efforts and social service programs, and feel safer in their communities as a result of drug elimination efforts.

The Coordinator also told us that she obtains more subjective information to assess the success of the program. For example, resident managers have told her that there is less overt drug activity at the targeted developments. She said that five years ago at the Springwood development businesses would not deliver pizza or newspapers because of fear of crime; police would not go into the property without two cars; and the fire departments would not go into the project without a police escort. The Coordinator noted that all of this has changed since a police substation was placed in the development. She also said that onsite police consider the Park Lake development an island of quiet in a higher-crime neighborhood.

To verify the reliability of crime statistics reported to HUD, we traced a sample of crime frequency data from five Outcome Monitoring Reports to police department source documents. We found that crime statistics reported to HUD agreed with these source documents.

Crime statistics were inconclusive, but residents feel safer.

To independently review program outcomes, we performed a trend analysis using the 1994 to 1996 Outcome Monitoring Reports. We found that the crime data was generally inconclusive. Our analysis showed a meaningful downward crime trend for only the Southwest area (Park Lake). For that area, robbery, calls for service, vandalism-related repairs, and Part I and II crimes all showed a declining trend. For the South, Southeast, and East areas, either data was insufficient to make analysis meaningful; crime data was not consistent and, therefore, not comparable from year to year; or no clear trend was determinable. For all geographic areas, a clear cause-and-effect relationship between crime data and Drug Elimination Program activities could not be established.

The Coordinator told us that several factors tended to reduce the usefulness of reported crime data:

- For smaller projects, a few problem families can have a large impact on crime statistics.

- Crime increases may result from a change in police jurisdictions.
- Crime data for Housing Authority sites are often mixed with the surrounding neighborhoods.

2. The Housing Authority submitted reports timely.

A statistician for the King County Police Department agreed with this assessment. He told us that many “confounding factors” make it difficult to tie a reduction in crime levels to specific crime prevention activities. For example, nationwide crime rates have been dropping recently and some statisticians believe this decline results from the aging of the teenage population. In addition, some indicators such as calls for service may actually increase when a community policing substation is introduced in a development. Incorporation of cities and annexations also affect crime statistics because a change in police jurisdictions can affect how crimes are reported. Further, changes in personnel at the substations (for example, strong personalities with “gung ho” attitudes) may result in positive changes in crime rates. Finally, the statistician told us that demographic changes in resident populations can affect the level of crime.

To further assess program outcomes, we judgmentally selected and interviewed a sample of 23 residents at 8 of the targeted developments. On average, these residents had lived at the developments for over nine years. All 23 residents told us that their developments are good places to live, and various residents reported that the developments are clean, quiet, well maintained, and/or good for raising children. No one told us that crime is a problem at his or her development. Of the 23 residents interviewed, 15 (out of 20 who live in developments with police substations) said that they feel safer because of on-site police.

In accordance with 24 CFR 85.40-41 and 85.50, grantees are required to provide the local HUD Field Office with semi-annual and final performance and financial reports. Semi-annual reports (for periods ending June 30 and Dec 31) must be submitted by July 30 and January 31 of each

year, and final reports must be submitted within 90 days after the termination of the grant agreement.

For the period of our review, we found that the Housing Authority was required to submit a total of nine performance and financial reports for the Drug Elimination Grants. Our review found that eight of the reports were submitted to HUD timely. Based on the receipt date stamp, one set of reports due January 31, 1995, was submitted seven calendar days late. We did not consider this a significant issue because the set of reports was only seven days late, and the Housing Authority drew down funds only after required reports were submitted.

The Housing Authority provided baseline data for law enforcement services at the completion of field work.

The NOFAs list both eligible and ineligible activities under the program. Eligible activities include employment of security personnel, reimbursement of local law enforcement agencies for additional security and protective services, physical improvements to enhance security, and drug prevention, intervention, and treatment programs. Examples of ineligible activities are costs incurred before the effective date of the grant agreement, organized fund raising, and indirect costs as defined in OMB Circular A-87. For certain activities listed as eligible, the NOFAs also require grantees to meet additional requirements.

3. The Housing Authority expended funds on only eligible activities.

We selected a judgmental sample of about ten percent of grant fund expenditures for Fiscal Years 1995 and 1996, and found that the Housing Authority expended funds on eligible items. We reviewed invoices from service providers, narratives describing activities, and client data to determine whether funds were expended for any of the ineligible items listed in the NOFAs. We found that funds were expended for only eligible activities. In addition, we selected and reviewed 23 contracts for both police departments and service agencies, and compared the scope of work in these contracts with applicable criteria. For these contracts we also found that the Housing Authority contracted for only eligible activities.

To be reimbursed for law enforcement services under the Drug Elimination Program, the NOFAs require applicants to provide detailed data on the kinds of services provided to

targeted developments, including the number of officers and equipment furnished, and the actual percent of time officers are assigned to these developments. Once this baseline is established, applicants must then demonstrate to what extent the funded activity will represent an increase over the baseline. Applicable NOFAs define “baseline services” as those law enforcement services the locality is contractually obligated to provide under its Cooperation Agreement with the applying housing authority. (24 CFR 761.15 and 24 CFR 961.10 reiterate this NOFA requirement.)

We reviewed the Housing Authority’s applications for Fiscal Years 1995 and 1996, and found that the applications did not contain the detailed baseline data required by applicable NOFAs and regulations. The applications did, however, provide narratives of baseline services. The Housing Authority’s Resident Initiatives Coordinator (who prepared the grant applications) told us that the police departments, when they were interviewed for the Drug Elimination Program grants, only provided narrative baseline information.

At the conclusion of our field work we discussed this issue with the Housing Authority’s Director of Housing Management and Director of Resident Support Services. The Director of Resident Support Services provided schedules of baseline services which were confirmed and signed by officials at the police departments. This Director told us that the local police departments held focus groups—in 1991 and again in 1996—to develop estimates of baseline services on a per-project basis. These focus groups reached a consensus. As a result, the estimates of baseline hours for patrols, investigations, dispatch support and other services were identical for all three departments.

Regarding detailed baseline information, an official at the Kent Police Department wrote: “We have no statistical data showing our services to this area without the existence of officers assigned to the development ... the figures we are using are our best estimation as to what services would be without the advent of this program.”

We did not attempt to verify the reliability of these estimates because, according to a local police official and the Housing Authority’s Resident Support Services Director, statistical data supporting the estimates was not

available. However, based on a) our determination that the substations were established as a direct result of funding provided under the Drug Elimination Program (see above) and b) our review of the estimates baseline services confirmed and signed by officials at the police departments, we concluded that the Housing Authority's expenditures for law enforcement services represented an increase over the baseline and were, therefore, eligible under program requirements.

For the three police departments providing community policing services at the Housing Authority's targeted developments, expenditures for the substations were as follows:

	FY 95	FY 96
King County Police	\$ 138,442	\$ 94,139
Kent Police	\$ 148,228	\$ 152,481
Auburn Police	\$ 52,002	\$ 55,824
Total	\$ 338,672	\$ 302,444
Law Enforcement Reimbursement (Budget Line Item 9110)	\$ 338,672	\$ 302,444
Grant Amount	\$ 784,250	\$ 791,250
Percent of Grant	43 %	38%

Targeted Developments

Targeted projects for the Housing Authority's Drug Elimination Program

Project name	Location	Units	Total residents as of Feb 1998
Ballinger Homes (1994 and 1995 only)	Unincorporated North King County (Seattle)	111	409
Eastside Terrace	Bellevue	50	141
College Place	Bellevue	51	142
Park Lake Homes I	Unincorporated Southwest King County (White Center area of Seattle)	568	1,652
Park Lake Homes II	Unincorporated Southwest King County (White Center area of Seattle)	165	536
Valli Kee Homes	Kent	114	436
Springwood Apartments	Kent	342	1,310
Cascade Apartments	Unincorporated Southeast King County (Kent)	108	344
Green River Homes	Auburn	60	178
Firwood Circle	Auburn	50	197
Burndale Homes	Auburn	50	191
Totals		1,669	5,536

Auditee Comments

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Executive Director:

STEPHEN J. NORMAN

June 5, 1998

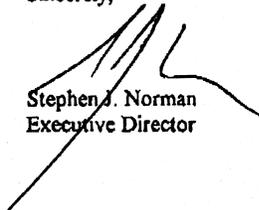
A. George Tilley
District Inspector General for Audit
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RE: Draft Audit of the DEG Program

Dear Mr. Tilley:

I have received and reviewed your draft report on the KCHA Drug Elimination Program for the Fiscal years of 1994 through 1996. In response to your request for comments, I concur with the audit results. I am very pleased with the report and believe it accurately reflects the program.

Sincerely,



Stephen J. Norman
Executive Director

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