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Audit Report Number	2007-FW-1001
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TO: Justin R. Ormsby
Director, Office of Public Housing, 6APH

FROM: Frank E. Baca
Regional Inspector General for Audit, Fort Worth Region, 6AGA

SUBJECT: Lubbock Housing Authority's, Lubbock, Texas, Lack of Management Controls
Resulted in Section 8 Units Not Meeting Housing Quality Standards

HIGHLIGHTS

What We Audited and Why

We audited the Lubbock Housing Authority's (Authority) Section 8 Housing Choice Voucher program as part of our strategic plan. Our objective was to determine whether the Authority's Section 8 units met housing quality standards and if not, determine the extent, cause, and impact of the housing quality standards unit failures on the Authority's Section 8 Housing Choice Voucher program.

What We Found

Of the 61 units we inspected, 47 (77 percent) failed inspections, and 30 (49 percent) were materially noncompliant with housing quality standards. The failures occurred because the Authority's Section 8 program lacked effective management and controls over the inspection process; specifically, the program had inadequate written policies and procedures, poor inspections, no quality control system, and negative staffing issues. As a result, the Authority housed families in units that did not meet the U.S. Department of Housing and Urban Development's (HUD) standards of decent, safe,

and sanitary housing. If the Authority does not implement effective management and controls, we estimate it will spend more than \$1.2 million in the next 12 months on the estimated 266 units expected to be materially noncompliant with HUD's housing quality standards.

What We Recommend

We recommend that HUD require the Authority to ensure that all 47 units that failed the Office of Inspector General's (OIG) inspections meet housing quality standards. Further, we recommend that HUD require the Authority's management to implement procedures and controls over its Section 8 inspection process to ensure that all of its units meet housing quality standards.

For each recommendation without a management decision, please respond and provide status reports in accordance with HUD Handbook 2000.06, REV-3. Please furnish us copies of any correspondence or directives issued because of the audit.

Auditee's Response

We provided a draft to the auditee on September 20, 2006, and requested a response by October 5, 2006. The authority provided a written response on October 5, 2006, and did not disagree with our finding. The auditee's response also detailed the steps it has begun and plans to take to address the deficiencies. HUD's Fort Worth Office of Public Housing agreed with our finding and indicated they will submit their management decisions after the final issuance of the report. The complete text of the auditee's response, along with our evaluation of that response, can be found in appendix B of this report.

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BACKGROUND AND OBJECTIVES

The City of Lubbock (City) is the ninth largest city in Texas and the largest city in west Texas. The Lubbock Housing Authority (Authority) was established in 1939 to provide decent, safe, and sanitary housing for families of low to moderate income. The Authority is governed by a seven-member board of commissioners appointed by the mayor for two-year terms. It administers both public housing and Section 8 programs. Its Section 8 Housing Choice Voucher program consists of 852 vouchers. The Authority's staff works and maintains administrative records and tenant files in its main office at 1708 Avenue G in Lubbock, Texas, except for its maintenance staff, which works and maintains its records at 1329 East 19th Street in Lubbock.

During January 2006, the U.S. Department of Housing and Urban Development (HUD) Office of Public Housing in Fort Worth identified the Authority as a candidate for an Office of Inspector General (OIG) audit. The Office of Public Housing considered the Authority troubled and placed it under a memorandum of agreement to improve its operations. The Office of Public Housing also questioned whether the Authority had the capacity to operate its housing programs effectively. The previous executive director had left the Authority in November 2005. A deputy director served as the interim executive director from November 2005 until April 2006 when the City assigned one of its managers to be the executive director of the Authority for up to two years. The Office of Public Housing supported the assignment. Both the Office of Public Housing and the City believe that the new executive director will help the Authority improve its operations.

We selected the Authority's Section 8 Housing Choice Voucher program for audit as part of our strategic plan. Our objective was to determine whether the Authority's Section 8 Housing Choice Voucher units met housing quality standards and if not, to determine the extent, cause, and impact of the housing quality standards unit failures on the Authority's Section 8 Housing Choice Voucher program. This is the first of three audit reports on the Authority's Section 8 program.

RESULTS OF AUDIT

Finding: Authority's Lack of Management Controls Results in Section 8 Units Not Meeting Housing Quality Standards

Of the 61 statistically selected sample units that we inspected, 47 (77 percent) failed inspection, and 30 (49 percent) were materially noncompliant with housing quality standards. The units did not meet standards because the Authority's Section 8 program had ineffective management and controls over the inspection process, including (1) ineffective or non-existent written policies and procedures, (2) ineffective and poorly documented inspections, (3) no quality control system, and (4) adverse staffing issues. As a result, the Authority housed families in units that did not meet HUD's standards of decent, safe, and sanitary housing. If the Authority does not establish effective management and controls, we estimate that over the next year it will pay more than \$1.2 million in Section 8 housing assistance payments for units with material housing quality standards violations.

The Authority's Section 8 Units Did Not Meet HUD's Housing Quality Standards

Our inspections found a total of 247 housing quality standards violations in the 47 units that failed inspection. Projecting the results of the overall failure rate to the Authority's universe of 680 units shows that at least 466 of the units or 68.6 percent would not meet minimum housing quality standards. In addition, we determined that 30 of the 61 sample units or 49 percent were materially noncompliant with housing quality standards.¹ Projecting the results of the 30 significant failures to the universe of 680 units shows that a minimum of 266 of the Authority's units would fail an inspection with violations that are materially noncompliant with HUD's housing quality standards. If corrective action is not taken, we estimate that the Authority will spend more than \$1.2 million in the next 12 months on these 266 units that are materially noncompliant.²

¹ See the Scope and Methodology section of this report for our definition of and method of determining which units were materially noncompliant.

² See the Scope and Methodology section of this report for our method of calculating funds to be put to better use.

The Section 8 Program Lacked Effective Management

The Authority's Section 8 program lacked effective management because the Authority's prior management overrode, ignored, or failed to establish controls over the inspection process. This led to 1) ineffective or nonexistent written policies and procedures, 2) ineffective and inconsistent inspections, 3) no quality control system, and 4) adverse staffing issues. These issues are discussed more fully in the following sections. The lack of management and controls caused a number of failures in the inspection processes, such as inspectors not:

- Performing inspections, not performing them in a timely manner, or not following up on failures in a timely manner;
- Adequately reviewing external conditions of units;
- Noting obvious fail items on inspections;
- Identifying health and safety fail items;
- Knowing what constitutes a fail item;
- Filling out inspection forms consistently;
- Maintaining accurate and organized records of inspections, which resulted in inspectors conducting multiple inspections of the same units; and
- Updating HUD's Public and Indian Housing Information Center database system through Form HUD-50058.

As a result, the Authority housed families in units that did not meet the minimum standards for decent, safe, and sanitary housing.

The Authority's Written Procedures Were Lacking or Ineffective

The Authority did not have written procedures or policies to ensure that inspections were performed or performed in a timely manner, failed inspections were followed up on, or rents were abated or tenants terminated if the inspection failures were not corrected in a timely manner. The Authority's Section 8 administrative plan was the only written policy the Authority had that addressed housing quality standards and the inspection process. However, the administrative plan lacked detail, and the Authority did not always follow the policies contained in it.

The Authority Lacked Procedures for Tracking and Monitoring Inspections

The Authority did not have documented procedures in place to ensure that it maintained accurate and organized records of inspections. The Authority did not

clearly define to its staff their responsibilities for maintaining the files and performing the inspections and what information needed to be maintained or tracked. As a result, it was unable to locate and provide copies of the previous inspections for 11 of the 61 units selected for inspection. In addition, the former Section 8 administrator had no log, reports, or system to track inspections to ensure that they were performed in a timely manner, followed up on if the unit failed, and entered into HUD's Public and Indian Housing Information Center database system. Management and staff did not know whether units were overdue for an inspection or reinspection. Based on a review of the information available, the Authority had not inspected 21 of the 61 sample units annually. Further, for the 61 units inspected, the Authority had not updated the HUD system to show the unit's last passed inspection date for one to three years for 29 of the units, meaning that more than a year could have passed between annual inspections. Both the prior executive director and the Section 8 administrator received error reports for HUD system data, but it was not until the new executive director was hired that headway was made in clearing the problems. Authority staff also said that they found inspection reports in the office of the former Section 8 administrator that had not been filed or entered into the Authority's computer system, which resulted in some inspections being duplicated. During our inspections, one tenant confirmed that her unit had two annual inspections within the last year.

The Authority Did Not Ensure That Failed Units Were Repaired and Reinspected within 30 Days

In addition to not being able to track or locate inspections, the Authority lacked a process to ensure that units which failed inspection were repaired and reinspected within 30 days as required by the Authority's administrative plan. Four units we inspected had previous failed inspections, and a reinspection was either not performed or not documented. A Section 8 inspector admitted to sometimes allowing owners to submit written proof of repairs made to failed units rather than performing an actual reinspection, a practice that violated the Authority's administrative plan. The Section 8 administrator also did not have a report or other tracking process to ensure that abatement or termination occurred for failed units if repairs were not made within 30 days of the original failed inspection as required by the Authority's administrative plan. Further, the Authority's inspector admitted to being unable to meet the 30-day reinspection requirement because the Authority was so far behind. Out of the 61 units in our sample, the Authority did not ensure that 14, which had failed a previous Authority inspection, were corrected within the required 30-day period. Instead, the Authority took an average of 56 days to follow up and ensure the units were repaired. The Authority did not abate the rent or terminate the tenants for any of the 14 units because it did not take such action if it was the Authority's fault that the unit had not been reinspected. In addition, the Authority could not ensure that failed units were reinspected in a timely manner as it did not reinspect 42 of the 47 fails within 30 days.

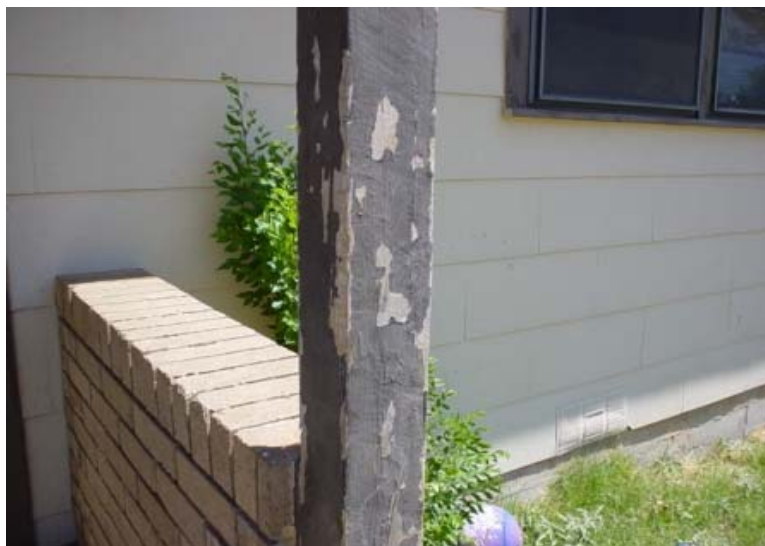
Inspections Were Ineffectively Performed and Poorly Documented

Section 8 inspectors passed substandard units because their inspections were not thorough and the Authority had not clearly defined what constituted a fail item. Further, the inspectors did not adequately document the results of their inspections or consistently complete the inspection forms.

Our inspections identified housing quality standards fail items that had obviously existed for some time at the unit, but the Authority’s inspectors had not detected or required correction of the issues. The Authority’s inspectors did not ensure that long-standing conditions, like the following sewer leak, chipping paint, rotted window sills, and unsafe air conditioning unit, were corrected.



Unit occupied by the tenant and three children with raw sewage seeping from under the foundation.



Unit occupied by the tenant and seven children, five of whom were age six or younger, with possible lead-based paint peeling on the front porch posts, which extended to the ground. This unit had passed inspection one month before our inspection.



Unit in which the window sills on the entire house's exterior were deteriorated and dry rotted.



Unit in which the air conditioner was improperly supported.

One tenant we interviewed stated that the previous inspector never went outside the unit during the inspection and the sewer leak pictured above had existed for two years. However, the Authority's current inspector indicated that he had sufficient time to perform inspections, including performing a general review of the exterior conditions of a unit.

The Authority's administrative plan defines the inspection standards a unit must meet by stating that a unit will meet the minimum housing quality standards as set forth in 24 CFR [*Code of Federal Regulations*] 982.401. These standards are quite broad. Interviews with Authority staff, including management, showed differing opinions on

what constituted a fail. Thus, the inspectors might not fail a unit for something that management or another inspector believes should fail and vice versa.

The Authority also did not ensure that its inspectors completely and consistently documented the results of their inspections. Of the 61 units we inspected, 41 had at least one of the following errors on the unit's prior inspection forms. The inspection

- Was not marked pass, fail, or inconclusive;
- Failed to identify the inspector;
- Did not include the date of the inspection;
- Did not identify the type of inspection (initial, reinspection, or special); or
- Failed to note the tenant's name.

In some cases, the only way to determine whether a unit had failed the previous inspection was that the Authority had issued a deficiency letter to the owner. Apparently, these errors and the inconsistencies in failures went undetected because the Section 8 administrator did not review the inspection reports.

There Was No Quality Control System in Place

Although its administrative plan contained steps for quality control inspections, the Authority did not have a system in place to ensure that its Section 8 staff performed them as required by HUD's regulations and its administrative plan. Instead, former Authority management overrode or ignored the controls, which were designed to monitor the effectiveness of the Authority's inspection process. Consequently, the Authority did not adequately perform or document quality control inspections and cannot support its Section 8 Management Assessment Program (SEMAP) self-certification and score.

The former Section 8 administrator either did not perform the quality control inspections or performed them inadequately. The former Section 8 administrator stated that she performed quality control inspections; however, she was unable to provide any documentation to support this statement, and other Authority staff stated that the Section 8 administrator did not perform the inspections. If she performed the quality control inspections, they served no useful purpose as she did not document the results of the inspections or discuss the results with the inspectors. As a result, the inspectors did not receive feedback as to whether they performed their inspections properly and in compliance with HUD's and the Authority's requirements.

The Authority also cannot support its September 2005 Section 8 Management Assessment Program self-certification that it had performed the required annual sample of quality control inspections. Previous Authority management was apparently unaware that support for the quality control reviews did not exist because

the former Section 8 administrator stated that management had never requested to see the reports on quality control.

Staffing Issues Had a Negative Impact

Ineffective management also led to high staff turnover and a lack of direction and training. The Authority has experienced significant turnover in management in the last 10 months. The previous executive director left in November 2005, and the City assigned one of its employees to be executive director in April 2006. The director of finance, who oversaw the Section 8 department, left in May 2006, and the Section 8 administrator resigned at the end of July 2006. In addition, during the last few years, the Authority's Section 8 department has seen both a decrease in size and a loss of experienced staff. Within the last 12 months, 13 people have worked in the Section 8 department and, as of August 2006, the department had a staff of four. None of the current staff has been there more than eight months.

The Authority's operational procedures have also fluctuated over time. Originally, the Authority had trained inspectors performing all of its inspections. At one point, though, the Authority began requiring caseworkers to perform inspections due to turnover. However, the Authority did not adequately train the caseworkers to perform the inspections, and the caseworkers were reluctant to perform them, fearing for their safety. The Authority currently has a single inspector. Training is still an issue, as the current inspector has not received specific training on HUD's housing quality standards.

The Authority Has Taken Steps to Address the Problems

The current executive director admitted that the Authority had no controls and has changed the operations of the Section 8 program. The Authority is working with HUD and another housing authority to improve its operations. The Authority is also working to decrease the number of inspections that are outstanding and to ensure that reinspections are performed in a timely manner. In addition, the Authority's inspector is using a handheld computer to perform and document inspections, which should significantly reduce documentation problems. The executive director and staff indicated that there has been a significant improvement in morale at the Authority, and HUD staff indicated that the Authority is improving.

Conclusion

Since the Authority did not have effective management to establish procedures and controls to effectively operate and monitor its Section 8 program, tenants lived in units that were not decent, safe, and sanitary. The Authority's new management has taken steps to correct the problems. However, HUD needs to ensure that the Authority's management establishes and implements policies, procedures, and controls that are consistently followed to prevent tenants from living in unsanitary and unsafe units. Further, Authority management needs to monitor the controls over the inspection quality control process to ensure that they are not overridden or ignored. The Authority's management also needs to revise its previous Section 8 Management Assessment Program score for quality control inspections and ensure that future certifications concerning quality control inspections are supported by adequate documentation.

Recommendations

We recommend that the director of HUD's Fort Worth Office of Public Housing require the Authority to

- 1A. Ensure that all 47 units that failed standards when inspected by OIG meet standards. If the units cannot be made decent, safe, and sanitary, either abate the unit if the fail item is owner related or terminate the tenant's voucher if the fail item is tenant caused.
- 1B. Establish and implement policies, procedures, and controls over its entire inspection process and systems that are consistently followed to prevent tenants from living in indecent, unsanitary, and unsafe units.
- 1C. Revise its previous Section 8 Management Assessment Program score for quality control inspections and ensure that future certifications concerning quality control inspections are supported by adequate documentation.

SCOPE AND METHODOLOGY

To accomplish our objective, we

- Obtained and reviewed relevant HUD regulations and the Authority's administrative plan.
- Selected a statistical sample of 61 of the Authority's units to inspect from HUD's Public and Indian Housing Information Center system, which is documented below.
- Obtained and reviewed, if available, the Authority's previous inspection reports and HUD data for the sample units to determine whether the unit 1) passed its last inspection, 2) was inspected annually, and 3) had a completed inspection report.
- Inspected the 61 units with a HUD staff person and the Authority's inspector to determine whether the units met housing quality standards. We then compiled and summarized the results as discussed below.
- Reviewed the 47 fails with the Authority's staff more than 30 days after the inspections had been completed to determine whether they had been reinspected according to the Authority's plan.
- Conducted interviews with Authority staff, Office of Public Housing staff, and program tenants.

Statistical Sample Selection and Methodology

To obtain a statistical sample, we obtained a download of all of the Authority's current tenants from HUD's Public and Indian Housing Information Center system as of March 9, 2006. We used the data although we were unable to match the data 100 percent to the Authority's housing assistance payments register. The HUD data download resulted in a universe that consisted of 680 current tenants. OIG's Information Systems Audit Division used the Statistical Toolbox software application to select the sample size based on the following sampling criteria: a 90 percent confidence level, a 50 percent expected error rate, and a 10 percent desired precision rate. Statistical Toolbox established a total of 61 tenants' units to inspect. We also used Statistical Toolbox to generate additional units to be used as replacements units. We inspected 61 units from June 5 to June 14, 2006, with a staff person from HUD's Fort Worth Office of Public Housing and the Authority's inspector, to determine whether the Authority's units met HUD's housing quality standards. We replaced eight of the original units because either the tenants had moved or the unit was not accessible.

OIG's Information Systems Audit Division used Statistical Toolbox to project the results of the 47 failed units to the universe of 680 units as follows:

- The lower limit is $68.6\% \times 680 = 466$ units not meeting housing quality standards, and
- The upper limit is $85.5\% \times 680 = 581$ units not meeting housing quality standards.

Using the same software, OIG's Information Systems Audit Division projected the results of the 30 units determined to be materially noncompliant with housing quality standards to the universe of 680 units as follows:

- The lower limit is $39.13\% \times 680 = 266$ units materially noncompliant with housing quality standards, and
- The upper limit is $59.23\% \times 680 = 403$ units materially noncompliant with housing quality standards.

Determination of Materially Noncompliant Units

After we conducted our inspections, we compiled the results defining a materially noncompliant unit as one that contained

1. Health and safety failures including tripping hazards, falling hazards, exposed wiring, carbon monoxide leaks, and water leaks and/or
2. Failure items that obviously existed during the Authority's prior inspection that the Authority did not note on the inspection form and that contained health and safety failures.

Determination of Funds to Be Put to Better Use

To calculate our estimate of funds to be put to better use, we determined the Authority's average housing assistance payment for all 680 units during our audit period. We then multiplied the Authority's average monthly payment per unit (\$378) by the lower minimum of 266 units determined to be materially noncompliant to arrive at a monthly estimate of overpayment, which we then annualized. This resulted in a \$1,205,989 estimate of funds to be put to better use ($266 \text{ units} \times \$378 \text{ monthly average rent} \times 12 \text{ months} = \$1,205,989$).

Inspection Data in HUD's System Not Reliable

We determined that the inspection data input by the Authority's into its and HUD's systems were not reliable. Our testing found instances in which HUD's information did not match hard copy inspection information in the Authority's files or the Authority did not have hard copy inspections to support the information in HUD's system. As a result, we did not rely on the inspection data in HUD's system unless the Authority had no other information available concerning a unit's inspection. Instead, we relied on available hard copy information. Further, we only used the HUD inspection data for determining whether units had been inspected annually, and we qualified our statements in this report concerning that testing.

We performed our on-site work between May 22 and August 9, 2006, at the Authority's offices, located at 1329 East 19th Street in Lubbock, and at the various units selected for review. Our work covered the period of January 1, 2005, through April 30, 2006. We expanded the scope of our review as necessary. We performed our review in accordance with generally accepted government auditing standards.

INTERNAL CONTROLS

Internal control is an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved:

- Effectiveness and efficiency of operations,
- Reliability of financial reporting, and
- Compliance with applicable laws and regulations.

Internal controls relate to management's plans, methods, and procedures used to meet its mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance.

Relevant Internal Controls

We determined the following internal controls were relevant to our audit objectives:

- Effectiveness and efficiency of program operations – Policies and procedures that management has implemented to reasonably ensure that a program meets its objectives.
- Compliance with laws and regulations – Policies and procedures that management has implemented to reasonably ensure that resources are used consistent with laws and regulations.

We assessed the relevant controls identified above.

A significant weakness exists if management controls do not provide reasonable assurance that the process for planning, organizing, directing, and controlling program operations will meet the organization's objectives.

Significant Weaknesses

Based on our review, we believe the following items are significant weaknesses:

- The Authority lacked effective management, controls, and written procedures over its inspection process to ensure that its units complied with HUD's requirements, and
- The Authority lacked an effective quality control system that complied with HUD's Section 8 Management Assessment Program requirements.

APPENDIXES

Appendix A

SCHEDULE OF QUESTIONED COSTS AND FUNDS TO BE PUT TO BETTER USE

Recommendation number	Funds to be put to better use <u>1/</u>
1B	\$1,205,989

1/ Recommendations that funds be put to better use are estimates of amounts that could be used more efficiently if an OIG recommendation is implemented. This includes reductions in outlays, deobligation of funds, withdrawal of interest subsidy costs not incurred by implementing recommended improvements, avoidance of unnecessary expenditures noted in preaward reviews, and any other savings which are specifically identified. In this instance, if the Authority implements our recommendations, it will cease to incur program costs for units that are not decent, safe, and sanitary and will instead expend those funds for units that meet HUD's standards. Once the Authority establishes and successfully implements the recommended procedures and controls, this will be a recurring benefit. Our estimate reflects only the initial year of these recurring benefits.

Appendix B

AUDITEE COMMENTS AND OIG'S EVALUATION

Ref to OIG Evaluation

Auditee Comments



HOUSING AUTHORITY OF THE CITY OF LUBBOCK

P.O. BOX 2568 LUBBOCK, TEXAS 79401 MAIN OFFICE 806•762•1191 FAX 762•0836

October 5, 2006

Mr. Frank E. Baca
Regional Inspector General for Audit
Region 6, Office of Inspector General
819 Taylor Street, Room 13A09
Fort Worth, TX 76102

As a result of the recent OIG on site visit, the feedback provided in your draft report and the exit conference, the Lubbock Housing Authority has implemented a number of corrective actions. I believe the actions will bring us in compliance with all Section 8 regulations immediately (by December 31, 2006) as well as provide internal controls to ensure continued compliance.

We have made numerous management and staff changes in the Section 8 Department since July 2006.

Policies and procedures are currently under review and will be updated as needed.

We implemented a quality control program and have already met the minimum requirements for our Section 8 program. Because of the HQS issues identified in your report, our objective is to inspect an additional 5% of our units.

In order to address the non-compliance of Section 8 Housing Quality Standards revealed during the recent audit by your office. The Lubbock Housing Authority entered into an Inter-local agreement with the City of Lubbock to provide certified housing Inspectors to perform special inspections of approximately three hundred fifty (350) units, currently under the LHA's Section 8 Program.

The inspectors are certified in several areas including lead base paint detection. However, the inspectors attended a two (2) day HQS training class presented by George Jackman of the Fort Worth Office of Public Housing. The inspectors will document all discrepancies observed and follow HQS guidelines as well as city ordinances. Owners and landlords will be advised of needed repairs in a timely manner. The inspectors that perform the initial special inspection will also return to the unit for a re-inspection within 30 days to insure HQS compliance. All Housing Assistance Payments (HAP) will be abated and assistance terminated on units that fail the re-inspection. The inspection of approximately 350 units along with on-going re-certifications inspections will ensure that all units under the LHA's Housing Choice Voucher program are in compliance with Housing Quality Standards by December 31, 2006.

Comment 1

On September 18, 2006 the LHA commenced a Section 8 participant folder review. The purpose is to insure that each folder contains HUD required documents, correct income/rent computations and to detect families that are over or under housed. The audit and associated corrections will also be completed by December 31, 2006.

All of the aforementioned procedures are components of the LHA's strategic plan to improve its operations.

I would like to commend your staff for the professional manner in which this matter was handled. They were very candid, provided excellent recommendations and were easy to work with.

Should you have questions or require additional information, please call me at (806) 762-1191 Extension 237.

Sincerely,

A handwritten signature in cursive script that reads "Quincy White".

Quincy White
Executive Director

CC: Justin Ormsby

OIG Evaluation of Auditee Comments

Comment 1: The Authority did not disagree with our finding. Their response detailed the steps it will take to address the deficiencies.