



U.S. Department of Housing and Urban Development  
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Philadelphia, PA 19107-3380

District Inspector General for Audit

January 24, 2001

**Audit Memorandum  
No. 2001-PH-1801**

**MEMORANDUM FOR:** William Tamburrino, Director, Public Housing Program, HUB

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

**SUBJECT:** Housing Authority of Baltimore City (HABC)  
Thompson Court Decree

Pursuant to our current audit of the Housing Authority of Baltimore City's (HABC's) Section 8 Program, our office completed an assessment of HABC's progress in implementing the Section 8 component of the Thompson Partial Consent Decree (Decree). Specifically, we reviewed the HABC's progress in creating and implementing a Mobility Counseling Program designed to assist residents, through the use of Special Section 8 Vouchers awarded under the Decree, to move from areas of minority concentration to non-impacted areas in Baltimore City and surrounding counties according to the terms and conditions of the Decree.

We found the HABC has made little progress in implementing the terms and conditions of the Section 8 component of the Decree in providing desegregated housing opportunities to public housing families now living in Baltimore City. Details of our review can be found under the "Results of Review" section of this memorandum.

### **BACKGROUND**

The Thompson Court Decree was the result of a lawsuit brought by Carmen Thompson and five other public housing families, represented by the American Civil Liberties Union (ACLU), alleging that the HABC and HUD engaged in racial and economic segregation through site selection and development of public housing in Baltimore City since 1937.

On June 25, 1996, the parties entered into a Partial Consent Decree, approved by a United States District Court Judge of Maryland. The Partial Consent Decree called for:

- complete demolition and replacement within 5 years of all of Baltimore City's family high-rise public housing projects and Fairfield Homes, a vacant low-rise project; and

- replacement of the approximately 3,000 demolished units with:
  - 1,200 new or rehabilitated public housing units in Baltimore City;
  - 800 new or rehabilitated units for project based rental and home ownership; and
  - issuance of 1,342 new tenant-based Section 8 Special Vouchers.

Special Voucher Program

Pursuant to the settlement, HUD provided the HABC funding for 1,342 Special Section 8 Vouchers primarily to help relocate families living in areas of minority concentration in the City of Baltimore to non-impacted areas in the City of Baltimore and surrounding counties as follows:

Area	Number of Vouchers
Baltimore City	200
Baltimore County	360
Surrounding Counties (Anne Arundel, Carroll, Harford, Howard and Queen Anne)	782
	1,342

The Decree targeted families that would be displaced from the four high-rises (Lafayette Courts, Lexington Terrace, Flag House and Murphy Homes) slated for HOPE VI redevelopment, and to assist other families living in public housing, public housing applicants and Section 8 families on the waiting list. In order to ensure the goals established under the Decree were accomplished, the HABC was required to hire a mobility counselor that offered relocation and advisory services to qualified families.

**OBJECTIVE, SCOPE AND METHODOLOGY**

The primary objective of our review was to determine if the HABC is successfully implementing the Special Section 8 Voucher component of the Decree set forth by the United States District Court for the District of Maryland. To accomplish our objectives we:

- interviewed HABC officials responsible for implementing the Decree;
- obtained a list of displacees affected by the demolition of Murphy Homes, Lexington Terraces, Flag House, and Lafayette Courts;
- visited the Relocation Coordinator to determine the status of the displacees, specifically whether they relocated to non-impacted areas;
- randomly selected a sample of displacees and reviewed their relocation files to determine if they were provided with information on all the housing options available, and whether they were encouraged to move to non-impacted areas;

- visited HABC officials responsible for providing counseling services to families displaced from the four high-rises; and
- visited the mobility service contractor, Baltimore Neighborhoods, Inc., (BNI) to determine whether they complied with the terms and conditions set forth in the Court Decree and performed the following tests:
  - obtained a list of all families who were housed with Special Section 8 Vouchers and reviewed their files;
  - reviewed a sample of files for families who were interviewed, but not yet housed; and
  - obtained and reviewed documents identifying the counseling services provided by BNI.

We also visited the American Civil Liberties Union, and the HABC's outside legal counsel to obtain their perspectives on the implementation of the Thompson Court Decree.

## **CRITERIA**

### The Thompson Court Decree

The Decree which was approved on June 25, 1996 requires the HABC, with the assistance of a mobility service contractor, to provide relocation assistance and advisory services to families displaced from the four public housing high-rises, (Flag House, Lafayette Courts, Lexington Terrace and Murphy Homes), other families living in public housing including scattered sites, public housing applicants and Section 8 families on the waiting list as of June 25, 1996. The Mobility Services Program is designed to offer housing opportunities to those families, assisting them to relocate to decent, safe, and sanitary dwellings not located in areas of minority concentration, designated by the Decree as non-impacted areas. To accomplish these goals HUD provided funding for the HABC to issue 1,342 Special Section 8 Vouchers.

### Professional Services Contract between HABC and BNI

The contract, that was signed on September 16, 1998, requires the BNI to provide Section 8 Vouchers and advisory services to qualified families who desire to move to non-impacted areas. These requirements are detailed in Section VIII, Mobility Counseling Services, and Appendix C, Duties of the mobility services contractor (Attached), of the Decree.

### Consolidated Annual Contributions Contract (ACC)

Section 10 (A), Civil Rights Requirements, states the Housing Authority shall comply with all statutory, regulatory, and executive order requirements pertaining to civil rights, equal opportunity, and nondiscrimination, as those requirements now exist, or as they may be enacted, promulgated, or amended from time to time.

## RESULTS OF OUR REVIEW

We found the HABC has made little progress in implementing the terms and conditions of the Section 8 component of the Decree to provide desegregated housing opportunities to families residing in Baltimore City public housing, public housing applicants and Section 8 families on the waiting list. Specifically, the HABC had planned to lease the entire 1,342 Special Section 8 Vouchers over a six-year period, or approximately 225 vouchers per year since the Decree was executed in 1996. However, based on records provided by the HABC and its mobility counselor, we found the HABC had assisted no more than 51 families in moving from impacted to non-impacted areas. Further, we found the HABC misreported the actual number of families assisted in its Fiscal Year 2000 PHA Plan submitted to HUD, stating they had served 285 families.

The HABC's inability to meet Decree requirements occurred because they did not:

- procure the Mobility Services Contractor concurrent with the relocation of the displaced residents from the four high-rises;
- monitor the performance of the mobility counselor;
- maintain accurate records on the number of families assisted; and
- provide any centralized point of contact with overall responsibility to oversee and coordinate the implementation of the Decree.

As a result of not complying with the terms and conditions of the Thompson Court Decree, public housing families continue to be racially and economically segregated within defined areas of the City of Baltimore.

### Relocation of Families From the Demolished High-Rises

Under the terms and conditions of the Decree, the HABC could not release vouchers for use as Special Vouchers until a Mobility Counseling Program administered by a non-governmental entity was available to the families. Because the HABC did not timely design and issue a RFP, the contract of services with BNI was not executed until September 1998, over two years after the execution of the Thompson Court Decree. Since HOPE VI redevelopment activity had already begun at two of the four high-rises (Lafayette Courts and Lexington Terrace), the 885 families relocated from these projects were not provided mobility counseling services according to Decree requirements. Consequently, the HABC was not in a position to offer any of these families Special Section 8 Vouchers when they were required to relocate. However, 21 of these families subsequently expressed an interest to participate in the Special Section 8 Program and 4 of these families were eventually issued a voucher, but as of October 2000 no one has yet successfully leased a unit.

HABC provided relocation counseling to all 592 displaced families from the other two high-rises (Flag House and Murphy Homes). The HABC also provided optional mobility counseling to 105 of these families who expressed an interest in participating in the Special Section 8 Voucher Program. Based on an analysis of records provided by BNI, only 44 of 592 displaced families

were eventually referred from these two high-rises, which resulted in only 6 vouchers being issued and one family leasing a unit pursuant to the Special Voucher Program.

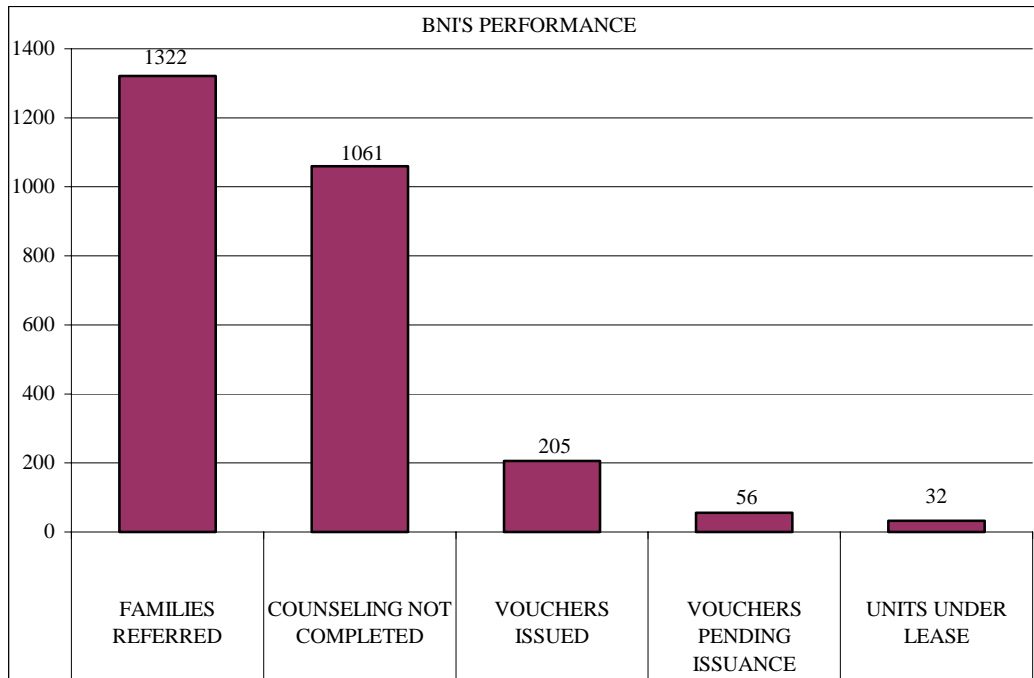
Status of Displaced Tenants

Despite the fact that only one family displaced from the four high-rises relocated to a non-impacted area with a Special Section 8 Voucher, we asked the HABC to provide us with a status of all of the displaced families so we could determine whether families moved to non-impacted areas and/or rehabilitated HOPE VI units independent of the counseling program. The HABC could only provide listings of where a family moved, but could not provide documents identifying whether families relocated to non-impacted areas. The OIG obtained census tract information and compared it to the HABC’s list of displaced families and determined the vast majority of the families still reside in impacted areas as illustrated below:

High-Rise	Total Number of Families	RELOCATED TO:			
		Non-Impacted Areas	Status Unknown	Impacted areas (Public Housing, Section 8, and Private Housing)	Pleasant View Gardens/Terraces Hope IV Projects
Lafayette Courts	587	8	147	278	154
Lexington Terrace	298	4	83	170	41
Flag House	179	4	16	132	27
Murphy Homes	413	1	86	296	30
Total	1,477	17 a/	332	876	252
a/ Only one family (located in Flag House) leased a unit pursuant to the Special Voucher Program					

Mobility Counselor Performance

Through outreach meetings conducted by BNI in May and June of 1998 and its own mobility counseling discussed above, the HABC compiled a list of 1,322 families that were referred to BNI. These families were living in impacted areas and voluntarily agreed to participate in the Mobility Counseling Program. These referrals included the 65 families from the displaced high-rises. We reviewed BNI’s database and determined that the vast majority of families had not yet completed mobility counseling. As illustrated below, 1,061 of the 1,322 families (80 percent) referred to BNI, had not yet completed mobility counseling and, therefore, were not eligible to receive a voucher; 205 families received a voucher; and 56 are pending issuance. Only 32 of the 205 families that received a voucher have successfully leased a unit in a non-impacted area.



BNI did not update its database timely, and therefore, could not provide us with pertinent information for over 800 of the 1,061 families (75 percent) who initially expressed some interest in participating in the program, but had not yet completed the mobility counseling process. The families either did not show up for their initial interview, attend required counseling workshops, or provide BNI with additional information that was requested. BNI's Executive Director could not provide us with an explanation as to why the database was not being updated.

BNI's Executive Director said they were not able to achieve greater success in implementing the program because: HABC's referral listing was outdated by the time they were able to initiate contact with the family; residents were apprehensive in relocating due to the limited availability of transportation resources and their unfamiliarity with the non-impacted areas; and the difficulty in recruiting landlords. We acknowledge the obstacles put forth by the Executive Director, however, as noted in Appendix C of the Decree, the duties of the mobility counselor are to provide counseling services to assist families in overcoming the aforementioned obstacles. Further, BNI's slowness in putting together a workable plan, and its failure to follow up with families interested in participating in the program contributed to the unsuccessful implementation of the program.

Contractor Performance

As of August 1, 2000, HABC had approved and paid BNI over \$540,000. However, HABC did not monitor the contractor's performance until May 2000 or 20 months into the contract. The HABC determined that BNI's performance was well below expectations, and recently, BNI notified the HABC that they will not be able to fulfill the terms of the contract and would withdraw as of December 31, 2000. However, according to BNI's Executive Director, the HABC's Acting Deputy Director terminated the contract on November 20, 2000.

### HABC Record Keeping

The HABC did not adequately track and maintain records on implementing the Decree, and therefore, could not provide an accurate account of the actual number of families assisted. Specifically, Special Voucher Program status reports provided by the HABC were not automated, and generally only indicated whether a voucher was issued, but did not always track whether the family leased a unit or if the voucher expired. We found this basic information was only maintained and updated by BNI, further evidencing HABC's failure to effectively administer the Special Section 8 Voucher Program. For example, as of November 2000, HABC officials indicated 218 vouchers had been issued and 51 units were under lease, while BNI's database identified 205 vouchers issued and 32 units under lease. Further, HABC reports did not identify that 41 of the 218 vouchers issued had expired, and the HABC significantly overstated its accomplishments in its Fiscal Year 2000 PHA Plan submitted to HUD, which incorrectly reported that 285 families had been assisted.

An HABC Section 8 official claimed that when a family leased outside the City of Baltimore, the HABC would not necessarily receive any information on their status. The OIG disagrees with that statement since the Special Section 8 Voucher Program is designed to house families outside the City of Baltimore. Additionally, the Decree clearly states that a Special Section 8 Voucher utilized outside the City of Baltimore does not remove it from the Special Section 8 Voucher Program. Therefore, the status of each voucher must be maintained.

### Overall Decree Responsibility

No responsible official(s) within the HABC assumed full responsibility for ensuring the Decree was appropriately and timely implemented. Initially, the HABC's Inspector General identified the Associate Director for Planning and Program Development as the responsible official to contact regarding the Decree. However, when we contacted this official we were told that officials within Housing Operations were responsible for administering the Decree. Although Housing Operations officials acknowledged they were responsible for administering the Decree, they did not know the current status of the Decree's implementation and could only provide additional points of contact, indicating we would need to contact the Section 8 Director for more specific information. Unfortunately, the Section 8 Director also could not provide an overall status on the implementation of the Decree. It was not until our site visit to HABC's Relocation Coordinator, not among the points of contact provided by Housing Operations and BNI, that we were able to obtain some information on the families who lived in the four aforementioned high-rises and the number of Special Section 8 Vouchers issued and under lease.

### Challenges to Decree Implementation

HABC officials pointed to the unique characteristics of the City of Baltimore's neighborhoods as an important reason for the slow progress in implementing the Decree. Apparently, residents of Baltimore have very strong ties to their neighborhoods, regardless of their race, and do not wish to move under any circumstances. Recently, as part of the Decree, the HABC planned to spend

\$4.1 million to purchase and renovate 40 homes in non-impacted areas in the City of Baltimore to provide rental housing for public housing residents. However, this plan met with considerable opposition from the local community. The opposition underscores the close ties residents have to their neighborhoods and the apparent difficulty city officials have in implementing the Decree.

In early October 2000, as a result of the aforementioned opposition and continuing management differences, the Mayor of Baltimore asked for and received the resignation of the HABC's Executive Director.

We acknowledge the HABC has a daunting task in relocating and placing families in non-impacted census tracts. However, it does not appear the HABC has placed any urgency or dedicated appropriate management resources to accomplish this task. The HABC's outside legal counsel cited BNI, the mobility counselor, as the primary reason for the lack of progress in implementing the Thompson Consent Decree. However, as stated above, the mobility counselor was not hired timely, and it was clear the Section 8 vouchers were not being issued and leased according to established benchmarks. Despite apparent implementation problems, the HABC had not conducted timely monitoring of its mobility counselor to measure its performance. The ACLU blamed the lack of progress in implementing the Decree on the time the Justice Department took to make changes to the RFP for the mobility counselor, HABC reluctance, and the time spent negotiating a contract with BNI.

\* \* \* \* \*

In summary, the HABC has not adequately administered or provided sufficient oversight to ensure the Special Section 8 Voucher component of the Thompson Court Decree is successfully implemented. Consequently, public housing residents continue to be racially and economically segregated within defined areas of the City of Baltimore.

Recommendations:

We recommend you ensure:

- 1A. The HABC develops appropriate policies and procedures to successfully implement the relocation, mobility services, and the Special Section 8 Vouchers component of the Thompson Court Decree. These policies and procedures should provide for the review and evaluation of the mobility counselor's compliance with Appendix C of the Decree.
- 1B. The HABC designates management personnel who will have overall responsibility for implementing the Decree and provide sufficient staff resources to accurately account for the Special Section 8 Vouchers leased and issued; and monitor the performance of its mobility counselor.
- 1C. The HABC expediently recruits a new mobility counselor that can adequately implement Appendix C of the Decree.



The results of our review were discussed with HABC officials during the review and at an exit conference on January 5, 2001. HABC officials stated they agreed with the review and have initiated actions to implement the recommendations made in this report. We have included the HABC's response in its entirety as Appendix A.

If you have any questions, please contact Allen Leftwich, Assistant District Inspector General for Audit at (215) 656-3401.

APPENDIX C

THE MOBILITY COUNSELING SERVICES CENTER:  
DUTIES OF THE CONTRACTOR

I. Purpose of the Program

The purpose of the Mobility Counseling Services Program is to remove barriers which may impede the exercise of informed choice by eligible families receiving Section 8 assistance in determining where they utilize such assistance.

These barriers may include lack of information about other neighborhoods, lack of information about portability features and exception rents in the Section 8 program, lack of transportation, lack of child care, difficulty in effectively applying for available units, difficulty in satisfying tenant screening requirements, lack of a comprehensive listing of housing units produced with various forms of governmental assistance that are located in Non-impacted Areas, lack of affirmative marketing efforts by owners of such units, landlord unfamiliarity or misconceptions regarding the Section 8 program, illegal discrimination, and lack of assistance with transition--related problems following a move.

Nothing in the preceding paragraphs constitutes an admission of any kind by any defendant.

All duties, services, optional services, obligations and tasks of the Mobility Counselor enumerated in this Appendix or in Section VIII of this Decree shall be on behalf and for the purpose of assisting families who hold Special Certificates as meant by this Decree.

II. Housing Counseling Services to Families  
Holding Special Certificates

On behalf of families holding Special Certificates, the Contractor shall:

1. Provide families with detailed information about locational options in Non-impacted Areas and maintain listings of available vacancies;
2. To the extent feasible, refer each family to at least three (3) identified vacancies in Non-impacted areas that are located in neighborhoods selected by the family;
3. Provide services to assist families as they look for housing, including transportation, escort services and child care;

4. Provide individual counseling and advocacy, as needed, to families to assist them to pass standard tenant screening procedures;

5. Assist families with needed transitions after the move, including help in locating schools, churches, child care, employment, and social services, and assistance in reducing the sense of isolation or in resolving disputes with neighbors;

6. Provide assistance and appropriate referrals to families who encounter illegal discrimination or harassment;

7. Counsel families regarding homeownership options if and when HUD implements a program permitting the use of Section 8 assistance with homeownership; and

8. In determining an appropriate placement for a family with school age children, take into account the schooling needs of each child in the family and attempt to place the family in an area where those needs will be best met.

### III. Mobility Administration for the Special Certificates

On behalf of families holding Special Certificates, the Contractor shall:

1. Apply the HUD Section 8 screening and eligibility criteria found at 24 C.F.R. § 982.552(b), 60 Fed. Reg. 34715 (July 3, 1995) to determine which families will be eligible for Special Certificates, provided that the HABC will apply all other eligibility criteria, such as income criteria, and avoid placing families with landlords who have defaulted on any obligation to HUD or have a history of serious code violations.

2. Develop and implement a strategy to market the program and families to landlords in Non-impacted Areas and coordinate market-wide recruitment of landlords in Non-impacted Areas for the Special Certificate program.

3. Serve as a clearinghouse for information on housing located in Non-impacted Areas of the Baltimore Housing Market that is financed, in whole or in part, with Low Income Housing Tax Credits, mortgage or industrial revenue bonds, FHA mortgage insurance, or federal or state loans or grants, which are eligible to accept families with Special Certificates. These clearinghouse activities shall include compiling and updating the following data: units becoming available at initial rent-up, vacancies and turnover, location, unit size, rent levels and utility costs, security deposits, application and tenant selection procedures and any residency preferences used.

4. Monitor the affirmative marketing, advertising, and outreach efforts of the owners of such housing, including commitments made by owners in connection with the allocation of

**Low Income Tax Credit projects to serve public housing eligible families.**

5. Monitor market rents in Non-impacted Areas and assist HABC in applying for increases in FMRs and/or blanket exception rents.

6. Analyze the extent to which transportation is an impediment to the use of Special Certificates and to the ability of participating families to access the full range of housing in the Baltimore Housing Market. The parties agree to jointly seek a solution to the identified transportation problems of such families, which may include, but is not limited to, seeking expansion of public transportation in areas where families with Special Certificates reside or work. HUD and the Local Defendants are not obligated by virtue of this section to provide any funding authority, nor shall this section create any obligation on behalf of or with regard to any other federal official, agency, or entity.

7. At the direction of the parties, develop a plan for implementing use over a six-year period of the 1,342 Special Certificates referenced in Section 3.1.1 of this Decree in Non-impacted Areas, including the following distributions:

- a) Baltimore City--200 certificates (i.e., 33 per year);
- b) Baltimore County--360 certificates (i.e., 60 per year).

8. Work with the interested local jurisdictions in the Baltimore housing market to prevent the creation of undue concentrations of poverty. To the extent permitted by law, the contractor shall arrange placements so that no more than twenty percent (20%) of the units in any one apartment complex or development with fifty (50) or more units are leased by Section 8 certificate holders. In other areas, the mobility counselor will review concerns about concentration on a more specific level than census tracts in an effort to ensure that undue concentrations of poverty are not created.

9. Execute, at HUD's direction, a subcontract for the post-placement duties to interested Counties and/or their public housing authorities ("PHAs") or other appropriate local entities in the Baltimore Housing Market. The subcontract shall be in the amount of \$500 per Special Certificate for the first year of initial use, and \$250 per Special Certificate for the second year of initial use.

10. Receive input from interested local jurisdictions on issues of local significance, including the identification of units and landlords and the coordination of post-placement counseling and support services. In addition, the counselor shall confer with the designee of the relevant neighboring

jurisdiction prior to each placement within that jurisdiction. The contractor will also provide, with the assistance of the HABC, eligibility information about a Special Certificate holder upon the request of the local jurisdiction.

C-4

Auditee Comments



**HOUSING AUTHORITY OF BALTIMORE CITY**  
417 E. FAYETTE STREET • P.O. BOX 1917 • BALTIMORE, MARYLAND 21202-3134

*Paul T. Graziano, Executive Director*

December 21, 2000

Mr. Daniel G. Temme  
District Inspector General for Audit  
Mid Atlantic, 3AGA  
U. S. Department of Housing and Urban Development  
Wannamaker Building, Suite 1005  
100 Penn Square East  
Philadelphia, Pennsylvania 19107-3380

Subject: Thompson Consent Decree Audit

Dear Mr. Temme:

This memorandum acknowledges receipt of your draft review/audit of the HABC progress in implementing the requirements of the Thompson Consent Decree.

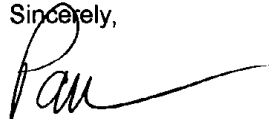
HABC fully concurs with the recommendations contained in the report and has taken the following actions to implement them:

- a) The BNI contract has been terminated, as referenced by the letter dated November 20, 2000, based on poor performance.
- b) The RFP for the new Mobility Counselor has been let, and the best and final offers submittals are being reviewed now. We anticipate having the new Mobility Counselor on board during the first quarter of next year.
- c) A full time Consent Decree Coordinator, reporting to the Executive Director, will be hired to monitor compliance with all requirements under the Thompson vs. HUD et al Partial Consent Decree.
- d) The HABC Mobility Panel will be tasked to develop policies and procedures that ensure effective monitoring of the contract in addition to identifying clearly defined performance measures.
- e) Executive responsibility for the implementation of the Consent Decree

remains with the Executive Director's Office, with field implementation responsibility of both the Relocation staff in Housing Management and the Section 8 staff.

Finally, HABC acknowledges your observations concerning the unique social dynamics which make all relocation efforts difficult, in particular those that are Consent Decree related. We believe, that however difficult the task, we have, and can marshal the necessary resources to accomplish the Consent Decree objectives, and serve the needs of the displaced residents. This will be a priority for this Authority.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul", with a long, sweeping horizontal line extending to the right.

Paul T. Graziano  
Executive Director

cc: Estella Alexander  
Gary A. Markowski  
Chron

Distribution

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