

**U.S. Department of Housing and Urban Development**

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July 9, 1997

**Audit Related Memorandum  
No. 97-BO-209-1802**

**MEMORANDUM FOR:** Carl J. Byers, Acting Director, Office of Public Housing, 1PHA

**FROM:** James F. Doherty, Assistant District Inspector General, Office of Audit, 1AGA

**SUBJECT:** New Bedford Housing Authority  
Public Housing Drug Elimination Program (PHDEP)  
New Bedford, Massachusetts

We conducted an audit of the New Bedford Housing Authority's (PHA's) Public Housing Drug Elimination Program (PHDEP) for Fiscal Years 1994 through 1996. The purpose of our review was to determine if the PHA used its PHDEP grants to effectively reduce drug-related crime and the problems associated with it in and around the PHA premises.

The PHA has been provided a copy of this report.

**Background**

The goals of the PHDEP are to eliminate drug-related crimes and problems associated with it; encourage Housing Authorities and Resident Management Corporations to develop a plan to address drugs and other related problems that includes prevention and intervention initiatives that can be sustained over a period of several years. The New Bedford Housing Authority has targeted 14 Federal housing developments (1,650 units) under the PHDEP.

In its Notices of Fund Availability (NOFA), HUD also encourages the Housing Authorities (HAs) to utilize PHDEP for other eligible activities such as job training, employment opportunities, referrals for family support services and economical and educational opportunities for residents.

To receive PHDEP funding, HAs must submit an annual grant application to HUD, using a PHDEP application kit, which contains eligibility requirements, selection information and rating criteria. The

points an application receives depends on the extent to which an application is responsive to information requested in NOFAs. Applications are evaluated based on four selection criteria: (1) extent of crime at HA sites; (2) quality of the HAs anti-crime plan; (3) capacity of the HA to implement its plan; and (4) extent to which residents and locality participate in and support the HA's anti-crime plan.

This PHA began receiving PHDEP grants in 1992, the same year it implemented its Police and Residents Involved in Drug Elimination (PRIDE) Program, which has two components: reimbursement of law enforcement for additional security and protective services (line item 9110) and drug prevention programs (line item 9160). As part of PRIDE, officers are assigned to foot and vehicle patrols at targeted Federal housing developments.

In addition, the PHA has assigned two full time staff members: the Resident Relations Coordinator and the Community Resource Representative to assist residents who wish to organize resident councils or establish on-site programs to enhance participation in community based programs.

For Fiscal Years 94 through 96, the PHA received and disbursed its PHDEP grants as follows:

Fiscal Year	Awarded	Disbursed (as of 1/1/97)	Remaining Balance
FY 94	\$ 412,500	\$412,500	\$ 0
FY 95	\$ 412,500	\$296,549	\$115,951
FY 96	\$ 401,750	\$ 0	\$401,750
Totals	\$1,226,750	\$709,049	\$517,701

For Fiscal Years 94 through 96, the PHA was awarded a total of \$1,226,750 in PHDEP funds, of which \$879,250, or 71 percent, was for law enforcement services. As of January 1, 1997, the PHA spent a total of \$518,120 from FYs 94 (\$300,000) and 95 (\$218,120) PHDEP grants to reimburse law enforcement.

### Scope

We limited our review to the PHA's controls and procedures over its implementation of the Program and administration of PHDEP grants awarded for FYs 1994 through 1996 to ensure that applicable Program goals were being achieved in the areas of Law Enforcement and Drug Prevention Programs. To achieve our audit objective, we:

- Interviewed PHA staff and New Bedford Police Department officials regarding the effectiveness of PRIDE Programs; and evaluated administrative practices to determine if the

PHA was administering its Drug Elimination Program in an efficient, effective, and economical manner.

- Interviewed two resident council members to assess the effectiveness of PRIDE Programs eliminating drug-related crimes in and around the premises of the PHA and encouraging resident participation.
- Reviewed seven Drug Elimination Program vouchers totaling \$211,480 from FYs 94 (5 vouchers totaling \$163,714) and 95 (2 vouchers totaling \$47,766) to assess the reasonableness and eligibility of costs.
- Reviewed HUD's Line of Credit Control System (LOCCS) and accounting records to ensure grant disbursements were made in a timely manner.
- Reviewed documentation supporting the PHA's application to evaluate whether the PHA made satisfactory progress toward its drug elimination goals.
- Interviewed HUD Massachusetts State Office, Public Housing Division, Supervisor of Operations, and Functional Specialists responsible for this project to determine what controls the PHA maintains over the program.

Audit work was performed from February through April of 1997 and covered the period January 1, 1994 through January 1, 1997 and was extended to include other periods, where appropriate.

### Conclusion

The PHA, with its implementation of the Police and Residents Involved in Drug Elimination Program (PRIDE), has taken positive steps to address the drugs and crime in the PHA.

PRIDE has been successful in eliminating much of the open drug dealing in and around the PHA and encouraging resident participation in drug prevention programs.

PRIDE's successful performance can be attributed to the New Bedford Housing Authority's strict "*No Trespass*" policy. To compliment the additional police presence, PRIDE provides a comprehensive and active drug prevention program designed to target drug related problems. This program aids at-risk families and youth.

PRIDE's performance in encouraging residents to actively participate in their community has been very successful. Many residents are active participants in planning Resident Councils. The high visibility of PRIDE has given many residents a sense of security and community.

Our review initially disclosed that the PHDEP applications from FY 94 to 96 did not adequately

define the baseline of local police services prior to the implementation of its PHDEP.

24 CFR Part 961.10(b)(2)(i) and NOFA Reimbursement of local law enforcement agencies for additional security and protective services provide:

*"Additional security and protective services to be funded under this program must be over and above those that the tribal, state or local government is contractually obligated to provide under its Cooperation Agreement with the applying HA (as required by the HA's Annual Contributions Contract). An application seeking funding for this activity must first establish a baseline by describing the current level of services (in terms of the kinds of services provided, the number of officers and equipment and the actual percent of their time assigned to the developments proposed for funding) and then demonstrate to what extent the funded activity will represent an increase over this baseline."*

The Executive Director advised that he felt baseline police services described in Cooperation Agreement were sufficient. The Cooperation Agreement states:

*"The City agrees that . . . it will furnish without cost or charge to the Authority or the tenants thereof, municipal services and facilities for such Project and tenants thereof, of the same character as those furnished without cost or charge for other dwellings and inhabitants in the City, including but not limited to: fire, police . . ."*

Although the Cooperative Agreement acknowledges that public housing residents receive police services of the same character and to the same extent as are furnished to residents of the locality, it does not define the baseline in terms of the kinds of services provided, the number of officers and equipment and the actual percent of their time assigned to the developments proposed for funding.

The Executive Director stated that to his knowledge, the PHA did not review police records or interview police department officials in order to establish a baseline.

Over the course of our review, however, the PHA responded to our concerns by providing the necessary documentation to support baseline services to satisfy the requirements of 24 CFR Part 961.10(b)(2)(i) and NOFA. The Executive Director's letter, dated April 9, 1997, explains that the city of New Bedford is geographically divided into three sections for police coverage: Downtown, Southend, and Northend. Each section has a fully equipped police station. The fourteen Federal housing developments designated under New Bedford's PHDEP are scattered throughout these three sections. As part of the City's deployment of resources, police officers and equipment are specifically assigned to each police station. Prior to receiving PHDEP grants, police officers made routine patrols and responded to all service calls demonstrating the same level of service to all residents of New Bedford.

Each year, the New Bedford Housing Authority executes a contract between the city of New Bedford and the Housing Authority for the provision of supplemental police services. These services were provided and are in addition to baseline services.

Furthermore, the Manager of Security, New Bedford Police Department and its Narcotics Unit have developed an effective monitoring and assignment process for these supplemental services. The Manager of Security collects and reviews PRIDE Patrol Activity Reports to ensure all police officers have completed and submitted a report; has weekly meetings with the Chief of Police, and is in daily contact with the officers of the Neighborhood Policing Program to maximize coordination of all law enforcement efforts.

Our review, however, disclosed that the PHA has launched an intensive campaign to combat drug related crime and problems associated with it. We found that the PHA's Performance Report details the accomplishments of PRIDE and accurately measures performance against its plan. This successful performance can also be attributed to:

- The New Bedford Housing Authority's strict "*No Trespass*" policy (implemented in February 1994), which is coordinated by the Authority's Manager of Security, the Bristol District Attorney's Office and the New Bedford Police Department PRIDE patrols has achieved impressive results. Enforcement of the PHA's "No Trespass policy" has led to the arrest and capture of numerous persons suspected of illegal drug activity.
- The PRIDE program provides a comprehensive and active drug prevention program designed to target drug related problems. This program aids at-risk families and youth.

Some of these programs are:

The University of Massachusetts Dartmouth Extension Program/4-H After School Program which provides educational and after school programs at the Gomes and Hayden-McFadden Schools for children 18 years or less. This program teaches teamwork, cooperation, positive life skills, responsibility, as well as encouraging children to think critically.

The Learning Center at the Mt. Pleasant School offers after school and academic programs for children and adults. These programs provide a means for self-empowerment and offer viable alternatives to drugs and drug related activities.

PRIDE's performance, in encouraging residents to actively participate in their community, has been very successful. Many residents are active participants in planning Resident Councils. The high visibility of PRIDE has given many residents a sense of security and community.

As a result of our review, we have determined that the New Bedford Housing Authority has developed, implemented, and administrated its PHDEP grants in an economical, effective, and efficient manner. Consequently, we are not making any recommendations in this report.

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