



# ***Audit Report***

## **District Inspector General for Audit Northwest/Alaska District**

*Report: 1999-SE-207-1002*

*Issued: March 31, 1999*

TO: Robert Kroll, Acting Administrator, Northwest Office of Native American Programs, OAPI

FROM: Frank Baca, District Inspector General for Audit, OAGA

SUBJECT: Citizen Complaint  
Cascade Inter-Tribal Housing Authority  
Sedro Woolley, WA

We performed an audit at the Cascade Inter-Tribal Housing Authority to evaluate allegations in a complaint received from a citizen. The complainant alleged waste and mismanagement when awarding a construction contract, and using a consultant.

The allegation relating to the award of a construction contract was not valid. However, we did find that the allegation relating to use of a consultant had merit.

As provided in HUD Handbook 2000.6 REV-2, within 60 days, please provide us, for each recommendation in this report, a status report on: (1) the corrective action taken; (2) the proposed corrective action and the date to be completed; or (3) why action is considered unnecessary. Also, please furnish us copies of any correspondence or directives issued because of this review.

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

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# ***Executive Summary***

We performed an audit at the Cascade Inter-Tribal Housing Authority (Housing Authority). Our audit objective was to evaluate allegations in a complaint received from a citizen. The complainant alleged waste and mismanagement at the Housing Authority when awarding a construction contract, and using a consultant.

The allegation relating to the award of a construction contract was not valid. While the appearance of a conflict of interest existed, the procurement and award of the elder and low rent duplex construction contract met the HUD requirements for full and open competition. In addition, the general contractor's use of a subcontractor with prior Tribal affiliation did not violate HUD requirements concerning conflict of interest.

We did find that the allegation relating to use of a consultant had merit. We evaluated both the procurement and administration of the consultant's contract to determine whether the process the Housing Authority's Interim Board of Commissioners (Interim Board) used complied with program requirements. We found that the Interim Board failed to follow its procurement procedures or to provide the oversight necessary to assure the consultant provided contracted services in a satisfactory manner. As a result, there is no assurance that payments to the consultant, totaling \$62,952, were reasonable. Also, the Housing Authority did not follow its procurement procedures when approving a subcontract by the consultant. Accordingly, there is no assurance the \$8,173 paid to the subcontractor by the Housing Authority was reasonable. This occurred because the Interim Board's priority was to immediately address prior audit findings. Therefore, the Interim Board hired and relied on the consultant, HUD's former Administrator of the Northwest Office of Native American Programs, who it believed had the program knowledge and experience necessary to resolve the Housing Authority's outstanding audit findings and any related development problems.

On February 8, 1999, we provided a draft of this report to the Housing Authority's Executive Director for comments. The Interim Board Chairperson provided us comments in a letter dated March 1, 1999. The Interim Board Chairperson's comments are included in Appendix A.

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## **Abbreviations:**

HUD            Department of Housing and Urban Development  
IHA            Indian Housing Authority

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# Introduction

The Housing Authority operates federally assisted low income housing for the Upper Skagit Indian Tribe and the Sauk Suiattle Indian Tribe. The Housing Authority manages 70 Mutual Help homes and has managed up to 118 Section 8 vouchers. The Upper Skagit and Sauk Suiattle Tribes are in the process of separating their housing operation due to the new Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA). This will result in the dissolution of the Housing Authority. These changes by the Tribes were taken into consideration when developing the recommendations for this report.

The Housing Authority received grants of \$2,159,900 in April 1995, and an additional \$753,124 in June 1996 to provide Low Rent housing. Little progress was made after the award of these grants, and due to information brought to the attention of the Upper Skagit Tribe's General Manager in July 1997, the former Executive Director of the Housing Authority was relieved of her duties. In addition, the members of the Housing Authority's Board of Commissioners were removed by the Tribes and members of the Tribal Councils were appointed Housing Authority Interim Board of Commissioners (Interim Board).

The Interim Board approved contracting with HUD's former Administrator of the Northwest Office of Native American Programs, as an Acting Executive Director, then executed a consultant contract in November 1997. On June 4, 1998, a single construction contract was signed to complete projects funded by the April 1995 and June 1996 grants.

## Audit Objectives

We performed audit work at the Housing Authority to evaluate the validity of allegations in a confidential complaint received by the Seattle Office of Inspector General. The complaint alleged waste and mismanagement at the Housing Authority in the areas of contract procurement and administration.

Our specific objectives were to:

- Determine if the contract to construct the elder development and low rent duplex units was procured in compliance with HUD regulations, and if the use of a subcontractor with prior Tribal affiliation was in compliance with HUD regulations.
- Determine if the award of the consulting contract by the Housing Authority complied with HUD and Housing Authority requirements; if the consultant becoming Acting Executive

Director was within the scope of work under the contract; and whether the consultant provided the product and services agreed upon for the agreed upon fees.

#### Audit Scope

The audit work covered events and transactions at the Housing Authority from October 1, 1997 through July 31, 1998 as we considered necessary to achieve our objectives and address issues in the complaint. The audit work covered the procurement of the construction contract and the consulting contract, and the Housing Authority's administration of the consulting contract.

Audit work was performed at the Housing Authority offices in Sedro Woolley, WA. Audit work was performed from August 1998 through September 1998.

#### Audit methodology

To achieve our audit objectives we:

- Reviewed the allegations, and interviewed the complainant to determine our objectives.
- Obtained, reviewed, and summarized regulatory and contractual requirements for the HUD-funded programs operated by the Housing Authority.
- Identified the appropriate individuals at the Housing Authority and HUD to provide information through interviews and who best to provide documentation.
- Interviewed HUD and Housing Authority staff, and obtained an understanding of the programs operated by the Housing Authority.
- Reviewed HUD and Housing Authority documents related to our objectives.
- Performed other procedures as determined necessary based on information obtained during the audit.

We conducted our audit in accordance with generally accepted government auditing standards.



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## **ONE OF TWO ALLEGATIONS OF WASTE AND MISMANAGEMENT WAS VALID**

We performed our audit to evaluate allegations citing waste and mismanagement at the Housing Authority when:

- A. awarding a construction contract, and
- B. using a consultant.

The allegation relating to the award of a construction contract was not valid. However, we did find that the allegation relating to use of a consultant had merit.

We concluded that the Housing Authority mismanaged the procurement of consultant services and the administration of consultant contracts. The Housing Authority's Interim Board of Commissioners selected a consultant to resolve deficiencies in their HUD-funded housing programs identified in a prior Office of Inspector General audit and did not follow established procedures for procuring the consultant's contract and its administration.

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### **A. *THE PROCUREMENT AND AWARD OF THE ELDER AND LOW RENT DUPLEX PROJECT MET THE HUD REQUIREMENTS TO ENSURE FULL AND OPEN COMPETITION.***

The complainant alleged that favoritism existed in the award of the elder and low rent duplex project construction contract and subcontract. Although the appearance of a conflict of interest existed, the procurement and award of the elder and low rent duplex project met the HUD requirements for full and open competition. In addition, the use of a subcontractor with prior Tribal affiliation did not violate HUD requirements concerning conflict of interest.

#### Background

The Housing Authority applied for a grant to develop a 20 unit low income elderly project on March 3, 1995, and was awarded \$2,159,900 for project number WA97B062004-G on April 10, 1995. The Housing Authority later applied for a grant to develop a 5 unit low rent housing project and was awarded \$753,124 for project number WA97B062006-G on June 27, 1996.

## Criteria

HUD regulations at 24 CFR 85.36 (c) and 24 CFR 950.160 state that all procurement transactions will be conducted in a manner providing full and open competition. Conforming to these regulations, the Housing Authority's procurement policies state that an invitation for bids shall be issued including specifications and all contractual terms. Bid openings will be held publicly, and award shall be made to the qualified organization with the lowest bid.

The Housing Authority's policy on conflict of interest states that no employee, officer, or agent of this IHA shall participate in the award or administration of any contract if a conflict would be involved. Such a conflict would arise when a financial or other interest in a firm selected is held by an employee, officer or agent, any family relation, or an organization which employs or may employ any family relation. This policy conforms to HUD regulations at 24 CFR 85.36.

There are no Housing Authority or HUD regulations governing past Tribal employment restrictions.

## Award of the construction contract provided for full and open competition

The procurement and award of the construction contract for the two projects provided for full and open competition. The Housing Authority used the competitive sealed bid process with no conflicts of interest in the bid opening or contract award.

The Housing Authority advertised for sealed bids for the construction of these projects in four local newspapers April 2 through 5, 1998. In response to the advertisements, the Housing Authority received seven bids for construction of the projects. However, one bid, from the Fernando Business Group, failed to include a required bid bond and therefore was removed from the selection process.

The bid submitted by Fernando Business Group, raised the appearance of a conflict of interest because the owner was a former employee of the Tribe. Also, the owner was related to the Tribal General Manager, and a Tribal Council member. The Tribal General Manager also served as a member on the Housing Authority's Interim Board.

The information provided by the Housing Authority shows there was no conflict of interest in the bid by the Fernando Business Group. The family relationships were disclosed in the Contractor Questionnaire and neither of the relatives were present at the bid opening or Interim Board meetings where action was taken when the contract was awarded.

The low bid was provided by GBI Inc., and was presented to the Interim Board on May 5, 1998. On June 2, 1998 the Interim Board awarded the contract to GBI Inc.

The selection of the subcontractor did not cause a conflict of interest

The selection of Fernando Business Group as a subcontractor did not result in a conflict of interest. The company owner's prior employment with the Upper Skagit Tribe did not create a conflict of interest and relatives of the owner did not participate in the decisions to allow GBI Inc. to subcontract with the company.

After being removed from the selection process for the construction contract, the owner of the Fernando Business Group contacted GBI Inc. with a proposal to provide subcontracting services. Documented proposals were made to GBI Inc. on May 12, and May 14, 1998. On May 15, 1998, GBI Inc. provided a subcontractor list to the Housing Authority that showed Fernando Business Group was awarded a subcontract to provide electrical work.

The Interim Board was concerned about the eligibility of Fernando Business Group as a subcontractor on the project because of the owner's prior employment by the Upper Skagit Tribe. After consideration and discussions with HUD, the Interim Board agreed to allow GBI Inc. to use Fernando Business Group as a subcontractor. The Interim Board determined that there were no prohibitions against the Housing Authority allowing former Tribal employees to participate in contracts with the Housing Authority. Additionally, the available information shows no relatives participated in the decision of the Interim Board.

Conclusion

Housing Authority policies mention family relationships and employees as cause for Conflict

of Interest violations. However, no family member or Housing Authority employee was involved in the award or administration of the construction contract or subcontracts. Accordingly, there was no noncompliance with HUD or Housing Authority requirements.

Auditee Comments

The Housing Authority concurred with our conclusions regarding the procurement of construction contracts for the elder development and low rent units.

**B. THE HOUSING AUTHORITY INTERIM BOARD  
MISMANAGED BOTH THE PROCUREMENT OF  
CONSULTANT SERVICES AND THE  
ADMINISTRATION  
OF THE CONSULTING CONTRACTS.**

The complainant alleged that the consultant was allowed to exceed the specifications of his contract. We evaluated both the procurement process and administration of the consultant's contract to determine whether the Housing Authority's Interim Board complied with program requirements.

The Interim Board failed to follow its procurement procedures or to provide the oversight necessary to assure the consultant provided contracted services in a satisfactory manner. As a result, there is no assurance that payments to the consultant totaling \$62,952 were reasonable. Also, the Housing Authority did not follow its procurement procedures when approving a subcontract by the consultant. Accordingly, there is no assurance the \$8,173 paid to the subcontractor by the Housing Authority was reasonable. Due to the general lack of documentation or specific written products, we question what actual services or benefits the consultant did provide for the \$62,952 paid. However, both the Interim Board and the consultant believe that the agreed-to services were provided.

This mismanagement occurred because the Interim Board believed their priority was to address prior audit findings in a timely manner. To do this, the Interim Board procured and relied on the consultant, HUD's former Administrator of the Northwest Office of Native American Programs, who it believed had the program knowledge and experience necessary to resolve the Housing Authority's outstanding audit findings and any related development problems.

Background

In January of 1998, the Seattle OIG issued audit report 98-SE-207-1001 which included the conclusion that the Housing Authority's Board of Commissioners did not adequately carry out their oversight responsibilities and that the former Executive Director took advantage of her position. During that audit, the Upper Skagit and Sauk Suiattle Tribes removed the members of the Housing Authority Board of Commissioners and appointed Tribal Council members to the Interim Board.

Criteria

The Housing Authority's procurement policies, which are in agreement with HUD requirements,

including 24 CFR 85.36, state that supplies, services, and construction are to be procured efficiently, effectively, and at the most favorable prices available to the IHA; and promote competition in contracting.

The Housing Authority's procurement policies require that the method of procurement be selected from one of the four methods included in the policies. Those methods are:

1. Small Purchase Procedures,
2. Sealed Bids,
3. Competitive Proposals, and
4. Noncompetitive Proposals.

The Housing Authority policies state that procurements are to be conducted competitively to the maximum extent possible. The policies restrict the use of noncompetitive proposals to instances where the other three methods are not feasible, and justification for noncompetitive procedures or HUD approval is obtained. In addition, each procurement based on noncompetitive proposals shall be supported by a written justification for using such procedures.

Housing Authority policy also states that contracts and modifications shall be in writing, and are to be supported by sufficient documentation regarding the history of the procurement. The documentation is to include, as a minimum, the method of procurement chosen, the selection of the contract type, and the basis for the contract price. Additionally, the policy requires a contract administration system designed to insure that contractors perform in accordance with their contracts.

In addition, the Housing Authority procurement policies state that a cost or price analysis shall be performed for all procurement actions including contract modifications.

Interim Board did not follow procurement procedures

The Interim Board failed to follow the Housing Authority's procurement procedures when it procured consulting services from HUD's former Administrator of Office of Native American Programs. Our review of the procurement files

and discussions with Housing Authority officials indicate the Housing Authority did not award the contract by competitive procedures or demonstrate that the use of noncompetitive proposals was justified.

Housing Authority records did not show what method was selected for the procurement or that competitive procedures were used. The Tribal General Manager stated that the Interim Board had considered using a current consultant working on their Five Year Housing Plan, however time constraints prevented her use. The Interim Board determined not to hire a consultant previously used by the Housing Authority because they were not pleased with his past performance. The Interim Board only considered these two consultants and Leslie Consulting Services for work at the Housing Authority. However, there was no documentation to show that a cost analysis was completed or the basis for the selection.

In the absence of competition, the Housing Authority is required to prepare a written justification for using noncompetitive procurement. However, no justification was prepared and there was no evidence to show that the procurement met the requirements for a noncompetitive procurement.

The Housing Authority did not meet its requirements for contract administration

The Housing Authority's contract administration did not ensure:

- changes to the contract were written,
- the necessary oversight of consultant performance,
- the proper cost analysis was completed, and
- costs were controlled.

The consulting contract entered into by the Housing Authority and Leslie Consulting Services was to be conducted in two phases. Phase I was an assessment of the Housing Authority's management and operations, and would identify products to be produced in Phase II. The assessment under Phase II was to identify the work and procedures necessary to bring the Housing Authority into compliance with Federal



and Tribal regulations, codes and policies. The contract included a maximum of 50 hours of chargeable time at the rate of \$65 per hour.

The completion of Phase I resulted in an assessment report dated December 19, 1997 at a total cost of \$2,583.75 which was within the estimate included in the contract. The assessment report recommended a strategy for improving the Housing Authority which included the retention of the consultant to get programs started. The consultant recommended that he serve as the Housing Authority's Acting Executive Director and report to the Interim Board during Phase II of the contract.

The Housing Authority's Interim Board approved the Phase I report and agreed to continue with Phase II. However, an executed Phase II scope of work could not be provided. The draft Phase II scope of work included the objectives to finalize the scope, and retain the consultant through personal service contracts. Additional objectives in Phase II dealt with training, implementation, and assisting the Housing Authority in its operations. According to the consultant's time cards, work on Phase II began December 24, 1997 and the estimated time to complete Phase II was nine months at an estimated cost of \$30,000.

Under Phase II the Consultant became Acting Executive Director

Even though the Tribal Council Interim Board minutes approved contracting for the Acting Executive Director position, the Tribal Council, acting as Interim Board, approved a consulting contract that stated the consultant was an independent contractor and not an agent or employee. The contract required that any changes to the contract were to be mutually agreed to in writing and duly authorized.

The Housing Authority could produce no written documentation that suggested any changes were made to the executed contract, including the transition to Phase II. Although the Interim Board minutes agree to continue with Phase II, the procedures outlined in the consulting contract were not followed. In addition, the Housing Authority did not perform a cost or price analysis to evaluate the costs of Phase II as required at 24 CFR 85.36 (e).

In January 1998, the consultant began signing documents related to Housing Authority programs as Acting Executive Director, while continuing to bill the Housing Authority for his services under the consultant contract. The consultant's actions show that he changed roles from providing services as a consultant to acting on the Housing Authority's behalf as Acting Executive Director involved in the management of its programs.

The consultant's duties as Acting Executive Director prevented him from providing services agreed to in the original contract. Therefore, the consultant subcontracted with another consultant to provide the agreed-upon services instead. However, the consultant/Acting Executive Director entered into a subcontract prior to recommending to the Interim Board that a second consultant be used as a subcontractor. The Interim Board subsequently approved the subcontract.

We are uncertain in what capacity the consultant/Acting Executive Director was acting when he procured the subcontract.

- If the consultant procured the subcontract while acting as the Executive Director, the procurement failed to follow Housing Authority procedures by not soliciting bids, documenting procurement history, ensuring open competition, and including the Housing Authority as a party to the contract.
- If the consultant procured the subcontract while acting as a consultant, the Housing Authority's approval of this subcontract failed to adhere to Housing Authority policies and the guidelines stated in the original consulting contract. Neither party was to assign or transfer this contract or any obligations without prior written consent of the other party. In addition, the Housing Authority did not perform a cost analysis regarding this modification to the consultant's contract as required by Housing Authority policies.

Housing Authority's procurement procedures were not followed

In either capacity, the Housing Authority's procurement procedures were not followed when the subcontract was procured by the consultant/Acting Executive Director.

There is no assurance the amounts paid the subcontractor and consultant were reasonable

As a result, there is no assurance the \$62,952 paid to the consultant and the \$8,173 the Housing Authority paid to the subcontractor were reasonable amounts. Due to the general lack of documentation or specific written products, we question what actual services or benefits the consultant did provide for the \$62,952 paid. These costs exceeded the \$30,000 estimated in the consultant's contract and the annual salary of the prior Executive Director which was about \$36,000. However, both the Interim Board and the consultant believe that the agreed-to services were provided.

This occurred because the Board relied on the consultant

This occurred because the Interim Board, believed their priority was to address prior audit findings in a timely manner. To do this, the Interim Board procured and relied on the consultant, HUD's former Administrator of the Northwest Office of Native American Programs, who it believed had the program knowledge and experience necessary to resolve the Housing Authority's outstanding audit findings and any related development problems.

The Interim Board determined a need for a consultant to train the Housing Authority staff, and quickly resolve outstanding audit findings. The Tribal Council, acting as the Interim Board, felt that the former Administrator of Northwest Office of Native American Programs could provide this service. After entering into a consulting contract, the Interim Board relied on the consultant's recommendations without proper administrative oversight.

Conclusion

Full and open competition is the control to ensure goods and services are procured at a reasonable cost. There was no full and open competition when the Interim Board procured the consultant's contract where the costs totaled \$62,952. Additionally, there was no full and open

competition when the Interim Board approved the subcontract where costs totaled \$8,173. Therefore, we have no assurance that the amounts paid for the consultant's and subcontractor's services were reasonable. Further, the general lack of documentation or specific written products raise the question of what actual services or benefits the consultant did provide for the \$62,952 paid.

**Auditee Comments**

The Housing Authority generally agreed with the results of our audit.

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## ***Recommendations***

We recommend that you require the Housing Authority to:

- 1A. Demonstrate to your satisfaction that the consultant and subcontractor costs are reasonable or repay its housing program from non-HUD funds.
- 1B. Properly follow its procurement policies when procuring goods and services in the future.
- 1C. Provide adequate oversight of consultants in the future to ensure the services paid for are provided.
- 1D. Obtain and maintain adequate documentation to support the procurement of goods and services and all contracts to which the Housing Authority is a party.

## ***Management Controls***

In planning and performing our audit, we considered the Housing Authority's management controls relating specifically to our objectives to determine our auditing procedures and not to provide assurance on management controls.

Management control is the process by which an entity obtains reasonable assurance as to achievement of specified objectives. Management controls consist of interrelated components, including integrity, ethical values, competence, and the control environment which includes establishing objectives, risk assessment, information systems, control procedures, communication, managing change, and monitoring.

We determined that the management control categories relevant to our audit objectives were the Housing Authority's policies, procedures, and practices for ensuring that:

- Construction services were procured in accordance with all applicable requirements.
- Consulting services were procured in accordance with all applicable requirements.
- Consulting services were administered in accordance with all applicable requirements.

We evaluated the relevant controls as necessary to determine appropriate audit procedures for evaluating the allegations in the complaint. We chose not to rely on the management controls because the Housing Authority is in the process of separating into individual Tribal Designated Housing Entities under NAHASDA, and a new Interim Board was in place to administer Housing Authority programs.

During our audit, we determined that the management controls relating to the administration of consulting services were in place. However, they were not followed to ensure that all applicable requirements were met. The effect of management control not being followed is described in the results section of our audit.

## ***Follow-up on Prior Audits***

We conducted an audit, report number 98-SE-207-1001, issued January 30, 1998, at the Cascade Inter-Tribal Housing Authority to evaluate allegations in a complaint received through the office of Congressman Jack Metcalf of the United States House of Representatives. The complaint alleged fraud, waste, and mismanagement at the Cascade Inter-Tribal Housing Authority in the areas of:

- procurement,
- use of Comprehensive Improvement Assistance Program (CIAP) grant funds,
- travel,
- the award of Section 8 Vouchers and Mutual Help homes,
- calculation of payments for Mutual Help homes, and
- maintenance of Mutual Help homes.

Our audit report did not substantiate the allegations regarding procurement, use of CIAP funds, and travel. However, it did validate the allegations relating to the award of a Section 8 Voucher and a Mutual Help home, calculation of payments for Mutual Help homes, and maintenance of Mutual Help homes.

Our audit report contained six recommendations. Three of the six recommendations have had final action completed. The three remaining recommendations have all had management decisions reached, with action pending.

## Auditee Comments



Sent via Facsimile (206) 220-5159

### CASCADE INTER-TRIBAL HOUSING AUTHORITY

Upper Skagit • Sauk-Suiattle

RECEIVED

MAR - 3 1999

HUD/OIG AUDIT  
SEATTLE, WA

March 1, 1999

Frank E. Baca  
District Inspector General  
Office of Inspector General for Audit  
909 First Avenue, Suite 125  
Seattle, WA 98104-1000

Attention: Robert Woodard

Herewith, please find the Interim Intertribal Housing Authority Board's comments, responses, conclusions and recommendations on the draft audit report dated February 8, 1999.

A. **Procurement and award of elder and low rent housing construction contract.**

1. The Interim Cascade Intertribal Housing Authority Board concurs with the auditors conclusion for Item A.

B. **Procurement and use of Consultant**

1. The Interim Cascade Intertribal Housing Authority Board acknowledges (a) that the board failed to document its consideration and rejection of two other potential consultants prior to entering into the consultant contract as required (b) that the Interim Board failed to secure necessary approval prior to entering into Phase I of the consultant contract. (c) that the Interim Board failed the requirements noted in (a) and (b) prior to entering into Phase I of the consultant contract and to clearly delineate and cap scope and cost as required under procurement procedures, the Board however approved a Phase II statement of work.

**Background**

The Interim Board in its urgency and haste to respond and comply with the directives in the December 5, 1998 audit report, failed in its procedural procurement requirements. The Interim Board had determined at that time based on the audit report and our analysis of staff capability, that we needed to immediately seek outside assistance with the knowledge and expertise to expedite and prepare a work plan for the Board to implement within 60 days as required by the audit report. The magnitude of the task to correct long standing errors and the lack of expertise

**Frank E. Baca, Page 2**  
**March 1, 1999**

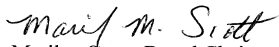
within the existing housing authority staff was the basis for the Interim Board to approve Phase I of the consultant agreement. The Interim Board, does however acknowledge whatever situation or facts at the time it did not warrant or allow for setting aside of process.

**Recommendation**

That the Interim Board take extreme care in adherence to procurement policies in the future.

If you have any question, feel free to call me at (360) 856-5501.

Sincerely,



Marilyn Scott, Board Chair  
Interim Cascade Intertribal Housing Authority Board

cc: Doreen Maloney, Acting General Manager  
Patrick Check, Comptroller



## Distribution

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Assistant Inspector General for Investigation, GI, (Room 8274)

Appropriate Special Agent-In-Charge

Director, Program Research and Planning Division, GAP, (Room 8180) Director,

Financial Audits Division, GAF, (Room 8286)

Director, Information Systems Audit Division, GAA (Room 8172)

Counsel to the Inspector General, GC, (Room 8260)

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