



Issue Date	August 20, 1999
Audit Case Number	99-BO-203-1004

TO: Donna J. Ayala, Acting Director, Office of Public Housing,  
Massachusetts State Office, 1APH

FROM: William D. Hartnett, District Inspector General, Office of Audit, 1AGA

SUBJECT: Central Falls Housing Authority  
Section 8 Program  
Central Falls, Rhode Island

We performed a review of the Central Falls Housing Authority's (PHA) Section 8 Program. The objective of our review was to determine if the PHA has been operating the Section 8 Program in an effective and efficient manner.

The report contains two findings which addresses: (1) a conflict of interest violation by the Chairman of the Board of Commissioners and, (2) the need for the PHA to improve its Housing Quality Standards inspection process and determinations of contract rent reasonableness.

Within 60 days please furnish for each recommendation, a status report on: (1) the corrective action taken; (2) the proposed corrective action with the date to be completed or, (3) why action is not necessary. Also, please furnish copies of any correspondence or directives issued because of this audit

If you have any questions, please contact our office at (617) 565-5259.



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# Executive Summary

We conducted an audit of the Central Falls Housing Authority's (PHA) Section 8 Program. The purpose of our review was to determine if the PHA was administering its Section 8 Program efficiently and effectively. The specific objectives were to determine whether:

- PHA's Family Self-Sufficiency (FSS) program was operating in an effective and efficient manner and in compliance with applicable regulations.
- PHA's procedures established to administer the Section 8 Program were adequate.

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## Audit Results

The PHA is in compliance with program requirements over its FSS Program. However, we found that the Chairman of the Board of Commissioners violated the conflict of interest provisions. The PHA also needs to improve its administration of the Section 8 Program by strengthening the procedures used in its Housing Quality Standards (HQS) inspection process and determinations of contract rent reasonableness.

## Recommendations

We are recommending that the PHA provide evidence that: 1) the ineligible Housing Assistance Payments (HAP) paid to the Chairman have been repaid to the Section 8 Program and 2) the Chairman's involvement in the Section 8 Program has been terminated. HUD should also instruct the PHA to institute administrative action against the Chairman, if warranted. The PHA should also perform quality controls of HQS inspections; increase its focus on defective paint during HQS inspections, and document that it has updated its market survey of private unassisted units in the area, including those owned by Section 8 owners.

## Findings and Recommendations Discussed

The findings were discussed with the PHA during the course of the audit. On June 15, 1999, we provided the PHA a copy of the draft report for comment. We received the PHA's response on July 26, 1999. In general, the PHA agreed to comply with most of the recommendations. We have included pertinent comments in the Findings section of the report. The PHA's response is included, in its entirety, in Appendix B.



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## Abbreviations

ACC	Annual Contributions Contract
CFR	Code of Federal Regulations
FSS	Family Self Sufficiency
HUD	Housing and Urban Development
HAP	Housing Assistance Payment
HQS	Housing Quality Standards
IPA	Independent Public Accountant
PHA	Central Falls Housing Authority
RI-DOH	Rhode Island Department of Health

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# Introduction

The Central Falls Housing Authority (PHA), is governed by a five-member Board of Commissioners, chaired by Richard B. Bessette. The Executive Director, Richard Leco, is responsible for the administration of PHA operations. The PHA's offices are located at 30 Washington Street, Central Falls, RI 02863. Within the PHA, the Section 8 Department is responsible for the Section 8 Program.

As of September 30, 1998, the PHA was administering 17 Section 8 projects, consisting of 381 units (325 Certificates, 33 Vouchers, and 23 Moderate Rehabilitation). In FY 1998, the PHA spent about \$2 million on these programs. In addition, there were 429 Low Income Public Housing units being administered by the PHA.

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## Audit Objectives

The purpose of our audit was to determine whether the PHA was complying with the provisions of its Section 8 ACC contracts with HUD, as well as applicable regulations, and to determine if they are administering their Section 8 Program efficiently and effectively. The specific objectives were to determine whether:

1. PHA's Family Self-Sufficiency (FSS) program was operating in an effective and efficient manner and in compliance with applicable regulations.
2. PHA's procedures established to administer the Section 8 Program were adequate.

## Audit Scope and Methodology

The audit was conducted between September, 1998, and April, 1999, and covered the period October 1, 1996, through August 31, 1998. The audit period was extended where necessary. To accomplish the audit objectives, we reviewed procedures and tested compliance as follows:

- We conducted physical inspections on 16 units to ensure compliance with HQS .
- We reviewed the PHA's Rent Reasonableness testing procedures to determine if rents were reasonable and in accordance with regulations.
- We examined tenant files to verify that tenants qualified as a family; that tenants' income was within income

limits; and to determine that recertifications were performed on an annual basis.

- We interviewed the PHA's Executive Director and Section 8 staff to determine systems and procedures used to conduct supervisory quality control HQS inspections, determine the reasonableness of contract rents, process HAP payments, and applicant screening/waiting lists.
- We interviewed HUD staff at the MA and RI State Offices concerning HUD policies and procedures on HQS inspections and rent reasonableness requirements.
- We reviewed the PHA's Section 8 FSS Program procedures, escrow accounts, and tenant participant files.
- We reviewed IPA reports for fiscal years (FY) 1996 and 1997 and PHA financial records for FYs 1996, 1997, and 1998.

Our audit was conducted in accordance with generally accepted government auditing standards.



# Chairman of the Board of Commissioners Violated Conflict of Interest Provisions

The Central Falls Housing Authority's (PHA) Chairman of the Board of Commissioners is a Section 8 landlord and received \$57,788 in Housing Assistance Payments (HAP) between June 1, 1993 and September 30, 1998. This violates the conflict of interest provisions because a waiver was never obtained from HUD. Without the PHA obtaining the required waiver from HUD, the Chairman has breached the HAP contracts with the PHA. Both the PHA and the Chairman, as a high-level officer, should have known that this contractual arrangement, without a waiver from HUD, was a conflict of interest violation.

## Conflict of interest Provision Federal Regulations

The PHA may not enter into any contract or arrangement in connection with the tenant-based programs in which any of a selective class of persons has any interest, direct or indirect, during tenure or for one year thereafter, including, but not limited to:

1. Any present or former member or officer of the PHA (except a participant commissioner);
2. Any employee of the PHA, or any contractor, subcontractor or agent of the PHA, who formulates policy or who influences decisions with respect to the programs; or
3. Any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs (24 CFR 982.161, Conflict of Interest, paragraph (a)).

Paragraph (b) of this regulation also requires each of the above persons to disclose their interest or prospective interest to the PHA and HUD.

Paragraph (c) provides that this conflict of interest provision may be waived by the HUD field office for good cause.

Section 17 of the HAP contract reiterates the Conflict of interest provisions found in CFR 982.161 above, and adds that:

## HAP Contract provisions Same as Federal Regulations

*“the owner certifies that no person has or will have a prohibited interest, at execution of the HAP contract, or during the HAP contract term.”*

Non-Entitlement of Owner to HAP

Section 9, paragraph g and h of the HAP contract state that:

*“Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments” and*

*“If the HA determines that the owner is not entitled to the housing assistance payment or any part of it, the HA, in addition to other remedies, may deduct the amount of the overpayment from any amounts due the owner (including amounts due under other Section 8 assistance contract.”*

Chairman Became Section 8 Landlord and Received HAP

The Chairman became a member of the PHA’s Board of Commissioners in 1984 and selected as Chairman in 1990. Subsequently, he signed six HAP contracts with the PHA, as a landlord, between May 1993 and September 1997, and began receiving HAPs on June 1, 1993, as follows:

	CY 93	CY 94	CY 95	CY 96	CY 97	CY 98 (End 9/30)	Grand Total
Certificates	\$2,996	\$4,280	\$4,270	\$9,956	\$15,505	\$12,635	\$49,642
Vouchers	0	0	3,997	0	0	0	3,997
Mod. Rehab.	0	0	0	4,149	0	0	4,149
Totals	\$2,996	\$4,280	\$8,267	\$14,105	\$15,505	\$12,635	\$57,788

As of September 30, 1998, the Chairman had only one tenant who was still a participant in the PHA’s Section 8 Program.

Each of the six executed HAP contracts had the same Conflict of Interest Provisions as in 24 CFR 982.161 (a). As mentioned before, by signing each HAP contract the Chairman certified that no person, either employee or officer of the PHA had an interest in these contracts. Therefore, the eligibility of \$57,788 in HAP is questionable.

Prior Waiver Required by HUD

As stated in 24 CFR 982.161 and Section 17, paragraph e of the HAP contract, the conflict of interest provisions may

be waived by HUD for good cause. The HUD procedure for requesting a waiver of the conflict of interest provisions is identified in a HUD Headquarters memorandum dated July 7, 1978. This memorandum was used by the PHA to obtain a waiver from HUD for another employee/landlord on March 5, 1997. Upon our request and review of PHA files, neither the PHA staff, including the Executive Director and Chairman, nor HUD officials could find the PHA's waiver request or HUD's approval of a waiver for the Chairman from the conflict of interest provisions.

#### HUD Needs to Take Action

The PHA and its Commissioners have ready access to PHA legal counsel for interpretation of conflict of interest issues and they are also charged with enforcing and executing policy in connection with requirements of federally funded public housing. At a time when HUD is very concerned about improving the quality of public housing and enforcing legal requirements for eligibility and occupancy upon applicants for public housing, it seems reasonable to expect that public housing board members would strictly adhere to all HUD guidelines or seek HUD input immediately in cases where doubt exists regarding their own eligibility to serve as PHA commissioners.

#### Auditee Comments

The PHA disagreed with our conclusion that there was no waiver request made and no approval received from HUD. The PHA states that it contacted the Providence HUD Office before the Chairman became a Section 8 Landlord, and it was their understanding, and operated under the assumption and assurance, that a waiver had been issued. A letter from the former Director of Leasing and Occupancy supports this understanding. The PHA, however, admitted that it was unable, unfortunately, to locate any written documentation or verification of this request and approval. The remaining comments address the PHA's intention to reimburse the Section 8 Program for \$57,888 in HAP paid to the Chairman; that the Chairman formally terminated himself from the Program; and that the lease of the remaining Section 8 tenant was terminated.

#### OIG Evaluation of Auditee Comments

The PHA did not provide any new factual information which would change our conclusion that a conflict of interest was created with the Chairman being a Section 8 landlord without obtaining a waiver from HUD.

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Recommendations

We recommend that you:

- 1A. Instruct the PHA to provide evidence that the Section 8 Program was reimbursed for funds paid to the Chairman as HAP, which totaled \$57,788 as of September 30, 1998.
- 1B. Instruct the PHA to provide evidence that the Chairman's involvement in the Section 8 Program has been terminated..
- 1C. Instruct the PHA to institute administrative action, if deemed appropriate, against the Chairman.
- 1D. Assure that the current Section 8 Program tenant that, was leasing from the Chairman, is appropriately provided alternative housing.

## Section 8 Program Administration Needs Improvement

The Central Falls Housing Authority needs to improve its procedures used in its Housing Quality Standards (HQS) inspection process and determinations of contract rent reasonableness. We found that defective paint was not always identified during HQS inspections, although there were instances where a child was residing in a unit which was built before 1978. The lack of required supervisory quality control HQS inspections contributed to this condition. In addition, the PHA's current procedures for determining rent reasonableness uses outdated data and is not administered in accordance with HUD regulations. It should be noted that neither the requirement for supervisory quality control HQS inspections nor procedures for determining rent reasonableness were included in the PHA's Administrative Plan.

### Inspections

#### HQS Required

Federal regulations require that HQS must be met both at initial occupancy and during the term of the assisted lease (24 CFR 982.401). Federal regulations also require that the PHA inspect Section 8 units at least annually, and at other times as needed, to determine if the unit meets HQS, and must conduct supervisory quality control HQS inspections (24 CFR 982.405).

#### Lead Based Paint Requirements

The lead-based paint performance and acceptability requirements, as a key aspect of HQS (24 CFR 982.401(j)), and RI State Law concerning lead-based paint poisoning prevention (R 23-24.6), establish procedures to eliminate "*as far as practicable*" the hazards of lead-based paint.

#### Deficiencies in HQS Inspections Noted

Inspection of 16 units by our office, accompanied by a PHA representative, resulted in failing 14 of the units while the initial PHA inspections had failed only 8 units. Of the eight failed by both the PHA and during our re-inspections, there were some similar deficiencies. Six units have since been re-inspected by the PHA and the deficiencies corrected to meet HQS.

More alarming is the fact that three of four of the units we re-inspected should have been failed by the PHA previously, because they had defective paint and were built before 1978 with a child residing in the unit at the time of their

inspection. We found, however, that these three units consistently passed HQS inspections, during the past three years, with no mention of defective paint. We also found that a required annual inspection was not performed in 1997 for one of these three units, although during the course of our audit, one was performed which finally identified the defective paint, which the tenant informed us was present for years.

According to the Director of Leasing and Occupancy, there have been no supervisory quality control inspections performed at the PHA. The PHA should ensure they are performed, however, to improve its inspection process to better identify deficiencies in HQS, especially the identification of defective paint to adequately protect young children from potentially lethal lead-based paint hazards.

### **Rent Reasonableness**

Knowledge of Current  
Rental Market Required  
and Must be Documented

Federal Regulations state that PHAs must certify, for each unit for which it approves a lease, that the contract rent for such a unit is: reasonable in relation to rents *currently* being charged for comparable unassisted units and not in excess of rent *currently* being charged by the Owner for comparable unassisted units. The PHA must take into account the location, type, quality, amenities, facilities, and management and maintenance service of the unit. The PHA shall maintain all certifications and relevant documentation for inspection by HUD for three years (24 CFR 882.106).

Furthermore, HUD regulations state that the PHA must have an overall *current* knowledge of the rental market within its jurisdiction and data on the rents being charged for specific units. The PHA will have to conduct either telephone, site visits, or more extensive market surveys of available rental units. The PHA will also have to determine the rents to unassisted units in the same building or other comparable units owned by the Section 8 Owner in order to certify that the contract rents are reasonable (HUD Handbook 7420.7, Chapter 6-5(b) &(d)(1).

Outdated Data

The last market survey of unassisted units in the area was performed in 1994 by the prior Director of Leasing and Occupancy and, consequently, the data we observed being used was outdated. There is no documentation of the

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rationale and procedures used in the development of this survey, except for the comparable unassisted unit checklists that were developed from the market survey in 1994.

#### Missing Documents

Checklists for current contract rents of 16 selected assisted units, showed that four checklists for comparable unassisted units were missing and checklists for five of the assisted units were missing. In addition, of the 12 remaining comparable unassisted unit checklists we reviewed, 10 were outdated (1994 or 1995).

#### Unassisted Unit Rents Not Verified

For the 11 assisted units checklists reviewed, the PHA did not verify the rents of the comparable unassisted units in the same building or other comparable units owned by the Section 8 owners in order to certify that contract rents are reasonable.

The PHA Director of Leasing and Occupancy advised that the PHA tried to obtain information on the current rents of Section 8 owners' other properties before through surveys. The PHA advised that they were not successful because the landlords were not cooperative, and that they have no other way of knowing what the rent being charged for the Section 8 owners' unassisted units are. We were also advised that rents have not risen significantly in 5 years in Central Falls to warrant them to perform annual reviews on the unassisted properties.

#### Administrative Plan Needs Updating

HUD requires that both the requirement for conducting supervisory quality control HQS inspections and how the reasonableness of contract rents will be determined and certified be addressed in the PHA's Administrative Plan, HUD Handbook 7420.3 REV, Appendix 18. We found, however, that neither was documented in the PHA's Administrative Plan.

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#### Auditee Comments

The PHA states that the required supervisory control inspections and policies are part of the administrative plan and its rent reasonableness policy and survey is up to date and incorporated in the administrative plan. In addition, the PHA is part of the statewide lead paint coalition, was cited by them as being in compliance with their requests, and is a signee of the

HUD Memorandum of Understanding regarding the lead paint issue.

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Recommendations

We recommend that you require the PHA to:

- 2A. Provide evidence the required supervisory control inspections and control policies are adequate and are included in its administrative plan.
- 2B. Increase its focus on defective paint during HQS inspections, when there is a resident child under six in a unit built before 1978, and take the necessary action as required by federal, state, and local codes, in terms of proper corrective techniques and re-inspections.
- 2C. Provide evidence that a current market survey of private unassisted rental units in the area, including those owned by Section 8 owners has been performed and is adequate.



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# Management Controls

Authority in order to determine our auditing procedures and not to provide assurance on management controls.

management to ensure that resource use is consistent with laws, regulations, and polices; that resources are safeguarded against waste, loss, and misuse; and that reliable data is obtained,

## Relevant Management

We determined that management controls in the following areas were relevant to our audit objectives:

### Housing Quality Standards

- levels

### Housing Assistance Payment Standards

- 
- Rent Reasonableness

### Fiscal reporting and management

We assessed all relevant control areas identified above.

## Assessment Results

A significant weakness exists if management controls do not consistent with laws, regulations, and policies; that resources are safeguarded against waste, loss, and misuse; disclosed in the financial statements and reports.

## Significant Weaknesses

Our review identified a significant weakness in management to PHA employees and officials. This weakness is described in the Findings section of this report.



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# Ineligible Costs

	<u>Ineligible 1/</u>
Finding 1	
Conflict of interest Makes HAP Ineligible	\$57,788

1/ Ineligible amounts obviously violated law, contract, HUD or local agency policies or regulations, such as buying unneeded services or not depositing receipts.





**Central Falls Housing Authority**

30 Washington Street  
Central Falls, RI 02863  
Main Office (401) 727-9090  
Section 8 Office (401) 727-9080  
Fax (401) 728-0291

July 23, 1999

Mr. Stephen King  
Assistant District Inspector General  
Office of Audit  
U.S. Department of Housing and Urban Development  
Room 370  
Thomas P. O'Neill, Jr. Federal Building  
10 Causeway Street  
Boston, MA 02222-1092

Dear Mr. King,

Enclosed please find the Authority's responses to the findings. I have already faxed this information to you and I thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Sheila Benaault for Richard A. Leco".

Richard A. Leco  
Executive Director

Enclosure

Equal Housing Opportunity



## Central Falls Housing Authority

30 Washington Street  
Central Falls, RI 02863  
Main Office (401) 727-9090  
Section 8 Office (401) 727-9080  
Fax (401) 728-0291

### Central Falls Housing Authority Responses

#### Finding #1

- (A) **The Central Falls Housing Authority had contacted the Providence HUD office before the Chairman became a Section 8 landlord. It was the understanding of this office and the Chairman that a waiver had been issued (see letter of Susan Johnson). The Central Falls Housing Authority and the Chairman operated under this assumption and assurance. Unfortunately, the Authority has been unable to locate any written documentation or verification of this request and approval. However, this Authority has no reason to question the veracity of either Susan Johnson or Chairman Bessette's recollection of the request and approval back in 1993. Since that date, Chairman Bessette has abstained and not participated in any Board of Commissioners votes relative to Section 8 housing. Chairman Bessette has not received any special exemptions, treatments or benefits from his participation in this program. His participation has always been a matter of public record.**
- (B) **The Central Falls Housing Authority will make the necessary entries and adjustments to its books to reflect the \$57,888 payment to the Section 8 program.**
- (C) **The Chairman has issued a letter terminating himself from the program.**
- (D) **A letter has been sent to the remaining Section 8 tenant terminating her lease.**

Equal Housing Opportunity

(E) **The Authority believes that it is incumbent upon the Office of the Inspector General before issuing its final Findings of Fact herein to obtain verification in writing from the Providence HUD office that they have conducted a thorough inspection and search of their records and files and have found no records nor documentation of any such request by the Central Falls Housing Authority in or about 1993.**

(F)  
**Finding #2**

- (A) **The required supervisory control inspections and control policies are a part of the administrative plan.**
- (B) **The Central Falls Housing Authority is in compliance with HQS regulations and state regulations as regards lead paint. The Central Falls Housing Authority is part of the statewide "Get The Lead Out" Coalition and has been cited by them as being only one of eight PHA's in Rhode Island for being in compliance with their requests. We are also a signee of the HUD Memorandum of Understanding regarding the lead paint issue.**
- (C) **Our rent reasonableness policy and survey is up to date and incorporated in our Admin plan.**

**Addendum:**

**Pursuant to a HUD representative's suggestion, Central Falls Housing Authority Executive Director Richard A. Leco spoke directly by telephone to Casmir Kolaski, former HUD Providence Office Director, and Anthony Britto, another former HUD regional employee about their personal knowledge and recollection of a waiver for Chairman Bessette. Mr. Kolaski did not recall any such request but did state that approval of such a request would not have been unusual. Mr. Britto also had no specific recollection of any such request, but did add that if any such request or approval was kept in a legal file at the Providence HUD office, that he did not believe that it could be located or found now because of the travel and handling of these legal files in that office.**

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November 30, 1998

Mr. Richard A. Leco  
Executive Director  
Central Falls Housing Authority  
30 Washington Street  
Central Falls, RI 02863

Dear Mr. Leco:

This letter concerns the matter of obtaining approval for Richard Bessette to be a participating landlord for the Section 8 Program in Central Falls.

Dating back to June of 1993, Mr. Bessette first sought permission to become a Section 8 landlord. At that time, approval was obtained from the Providence, Rhode Island Office of the Department of Housing and Urban Development. Only after receiving HUD approval was Mr. Bessette permitted to participate in the Section 8 Program.

Please feel free to contact me should you have any questions concerning this matter.

Sincerely,



Susan M. Johnson



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# Distribution

Deputy Secretary, SD, Room 10100 (1)  
Chief of Staff, S, Room 10000 (1)  
Special Assistant to the Deputy Secretary for Project Management, SD, Room 10100 (1)  
Acting Assistant Secretary for Administration, S, Room 10110 (1)  
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Director, Real Estate Assessment Center, X, 1280 Maryland Avenue, SW, Suite 800 (1)  
Director, Office of Multifamily Assistance Restructuring, Y, 4000 Portals Building, (1)  
Secretary's Representative, IAS (2)  
Assistant Deputy Secretary for Field Policy and Management, SDF, Room 7108 (2)  
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The Honorable Fred Thompson, Chairman, Committee on Governmental Affairs, 340 Dirksen Senate Office Building, United States Senate, Washington, DC 20510 (1)

The Honorable Joseph Lieberman, Ranking Member, Committee on Governmental Affairs, 706 Hart Senate Office Bldg., United States Senate, Washington, DC 20510 (1)

The Honorable Dan Burton, Chairman, Committee on Government Reform, 2185 Rayburn Bldg., House of Representatives, Washington, DC 20515 (1)

Henry A. Waxman, Ranking Member, Committee on Government Reform, 2204 Rayburn Bldg., House of Representatives, Washington, DC 20515 (1)

Ms. Cindy Fogleman, Subcommittee on Oversight and Investigations, Room 212, O'Neill House Office Building, Washington, DC 20515 (1)

Director, Housing and Community Development Issue Area, United States General Accounting Office, 441 G Street, NW, Room 2474, Washington, DC 20548 (Attention: Judy England-Joseph) (1)

Steve Redburn, Chief, Housing Branch, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Room 9226 New Executive Office Building, Washington, DC 20503 (1)

Deputy Staff Director, Counsel, Subcommittee on Criminal Justice, Drug Policy & Human Resources, B 373 Rayburn House Office Bldg., Washington, DC 20515