

**OFFICE OF THE INSPECTOR GENERAL
CHICAGO HOUSING AUTHORITY**

REPORT OF THE OFFICE OF THE INSPECTOR GENERAL

2017 FOURTH QUARTER REPORT
OCTOBER 01, 2017 THROUGH DECEMBER 31, 2017

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INSPECTOR GENERAL

JANUARY 12, 2018



January 12, 2018

To Chairman Hooker, Chair Markowski and Members of the Finance/Audit Committee:

Enclosed for your review is the 2017 Fourth Report on the activities and initiatives of the CHA Office of the Inspector General (OIG) pursuant to the mission and directives mandated in the *Office of the Inspector General Charter*.

The OIG received 183 complaints during the fourth quarter. The OIG provided 109 investigative support matters to internal and external stakeholders; referred 40 complaints to other CHA departments; declined 31 complaints; initiated 3 investigations; and closed 8 investigations during the quarter.

The OIG has 39 pending investigations, of which 30 have been opened for more than 6 months. An investigation can remain open longer than 6 months for variety of reasons including but not limited to complexity of the case; under review by the prosecuting agency; indicted but no dispositions; and investigations that are subject to grand jury inquiry. In order to maintain the integrity of on-going investigations, the OIG quarterly reports will not contain information on pending investigations.

Three criminal cases were closed during this quarter. Defendant Maurice Mills was convicted on November 14, 2017 of theft relating to fraud against CHA. The felony indictment was reduced to a misdemeanor in exchange for a plea of guilty. The conviction was referred to CHA Legal Department to initiate eviction proceedings if appropriate. Defendant Latoya Williams was convicted on November 17, 2017 of theft by deception. Her co-defendant husband Michael Fort was convicted on the same day for theft of government funds. One criminal case was declined by the prosecuting agency.

Four administrative investigations were closed and sustained. One investigation was not sustained. Of the 4 cases, two matters resulted in termination of the participant's vouchers.

The Public Housing Over Income Audit was completed during the 4th quarter. The summary of OIG Audit findings is contained herein under Section G: Closed Audits and Review of the quarterly report.

The OIG issued five advisory reports on various risk conditions identified during the course of OIG activities during this quarter. Each advisory provides recommendations that should significantly improve CHA's programs and/or operations. OIG met with CHA management on three of the advisories and will continue to meet with CHA management to discuss operational impact of implementing the OIG recommendations. Summaries of the individual advisories are contained herein under Section H: Advisories.

The OIG provided departmental support for the Resident Service Department by utilizing open source due diligence for CHA Health Partners during this quarter. The information provided to the Resident Service Department is a preventive measure to combat potential health care fraud against CHA senior residents. No derogatory information was found during this quarter.

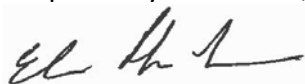
The OIG data analysis included a review of Registered Sex Offender list impacting CHA addresses for the last 90 days; and a status report on actions taken pursuant to various red flags that were indicative of potential landlord/tenant collusion.

The details on each of these areas will be covered in the body of this report and Audit Reports and Advisories will be attached in the 2017 Annual Report.

The OIG will continue to maintain and protect its independence to accomplish our mission through comprehensive investigation, audits, advisories, and data analysis.

As always, I thank Chairman Hooker, Chair Markowski and the members of the Finance/Audit Committee for their continued support of promoting transparency, accountability and public trust in the administration of CHA programs. To state the obvious, it is imperative that CHA leadership and employees act in a manner that is above reproach, with integrity, free from conflict or appearance of conflict and with transparency.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Elissa Rhee-Lee', written over a light grey rectangular background.

Elissa Rhee-Lee
Inspector General

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This quarterly report provides an overview of operations of the Office of the Inspector General (OIG) during the period of 10/01/2017 through 12/31/2017. This report includes statistical and narrative summaries of OIG activities for the past quarter.

A. MISSION OF THE INSPECTOR GENERAL'S OFFICE

The OIG is an independent oversight office whose mission is to promote economy, efficiency and integrity in the administration of programs and operation of the Chicago Housing Authority (CHA).

The OIG achieves this mission through:

- Criminal Investigations
- Administrative Investigations
- Program Reviews
- Performance Audits
- Analytics
- Advisories
- Fraud Awareness Training

From these activities, the OIG issues report of findings and disciplinary and policy recommendations to ensure that CHA officers, the Board of Commissioners, employees and vendors are held accountable for running an efficient, cost-effective operation. Furthermore, the OIG seeks to prevent, detect, identify, expose and eliminate waste, inefficiency, misconduct, fraud and abuse of public authority in CHA's use of funds.

B. INVESTIGATIONS AND PROGRAM REVIEW STANDARDS

The OIG conducts its investigations in accordance with the *Association of Inspectors General Principles and Standards for Office of Inspectors General*, generally accepted principles, quality standards and best practices applicable to federal, state, and local offices of Inspectors General. These include both general standards and qualitative standards as outlined in the above publication. Additionally, the OIG, always exercises due professional care and independent impartial judgement in conducting investigations and the issuance of reports and recommendations.

The OIG conducts audits of programs in accordance with *Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States and Principles and Standards for the Offices of Inspector General*. Those standards require that we plan and perform the audit to obtain sufficient, and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. The adherence to these standards ensures that audits and program reviews comprise the requisite independence, planning, organizing, staff qualifications, direction and control, coordination, reporting, confidentiality and quality assurance.

C. INVESTIGATIONS

The OIG conducts both criminal and administrative investigations into the performance of officers, employees, contractors, functions, and/or programs, either in response to complaints, audits or upon OIG's own initiative.

The OIG received 183 complaints/matters during the fourth quarter of 2017. Out of the 183 complaints, we provided investigative support to both internal and external stakeholders for 109 matters. We initiated 3 investigations, we referred 40 complaints to other agencies or departments and we declined 31 cases. Matters can be declined for a variety of reasons such as insufficient information provided, insufficient resources to address, no actionable information contained in the allegation, or not within the OIG’s jurisdiction. The OIG closed 8 investigations during the fourth quarter.

Table # 1 Complaint by Method

Complaint by Method

Source	Number
Emails	42
Website Submissions	93
Hotline	25
In Person	5
Mail	1
Fax	0
Analytics	17
Total	183

Table # 2 Complaint Disposition

Complaint Disposition

Disposition	Number
Investigations	3
Investigative Support	109
Referrals	40
Declined	31
Total	183

Table # 3 Subject of Investigation

Subject of Investigation

Subject	Number
Program Participants	1
Contractors, Subcontractors, Vendor	2
Employees	0
Other	0
Total	3

Table # 4 Investigative Classification

Investigative Classification

Classification	Number
Administrative	2
Criminal	1
Total	3

Table # 5 Closed Investigations

Closed Investigations During the Quarter

Classification	Number
Administrative	5
Criminal	3
Total	8

Table # 6 Indictments/Convictions

Indictments/Convictions

Action Category	Number
Indictments	1
Convictions	2
Restitutions	1
Debarment	0
Total	4¹

Table # 7 Pending Investigations

Pending Investigations

Classification	Number
Administrative	11
Criminal	28
Total	39

Table # 8 Pending Audits

Pending Audits

Audit Name	Time Frame
Property Rental Assistance Waitlist	01/31/2018

¹ One OIG investigation resulted in a conviction. As part of sentencing, the subject was required to pay restitution (See Page 10-Closed Criminal Cases for details).

INVESTIGATIONS NOT CONCLUDED WITHIN SIX MONTHS

Under the *Inspector General Charter*, the OIG must provide quarterly statistical data on pending investigations/matters open for more than six months. Of the 39 pending matters, 30 have been open for at least six months. The following table shows the general reasons why these matters remain open.

Table # 9 Investigations Not Concluded within Six Months from Initiation

Reasons	Number of Investigations
A. Complex investigation, generally involve difficult issues of multiple subjects and/or under review by prosecuting agency	26
B. Indicted cases, but no criminal disposition	4
C. On-hold, to not interfere with another on-going investigation	0
Total	30

D. NOTABLE INVESTIGATIVE SUPPORT

CHA Health Partnership Initiative

In collaboration with CHA’s Resident Services Department, the OIG reviewed five health partnership applications this quarter utilizing open source information. Of the five applications reviewed, there was no derogatory information identified. The OIG will continue to review partnerships on an ad-hoc basis and ensure activities provided by health partners are in the best interests of the CHA and its residents.

OIG Ref #2017-08-00027

An allegation was received on 8/22/2017 from the Illinois Department of Healthcare and Family Services (DHFS) regarding a Public Housing participant. The Investigator for DHFS stated the participant was receiving assistance from the State of Illinois (State) in the form of food stamps and medical coverage. The participant had recently removed her husband from her household, which resulted in her State benefits being increased. The participant had reported to the State that she was receiving housing assistance.

The DHFS investigator believed that the husband, contrary to the participant’s assertion, was still living at the same address, and DHFS determined that he recently purchased a home in Northlake, IL. DHFS also determined that the participant recently contacted the Social Security Administration to change her address to the Northlake address. The DHFS Investigator believed that the CHA housing participant may have moved out of her unit. The OIG determined that the participant had resided in a Region 2 Scattered Site Public Housing unit since March 2008.

OIG and DHFS investigators attempted to contact the participant at her CHA unit on 8/28/2017, but she was not present in the unit. The participant contacted the OIG later that day and denied that she had vacated her unit but admitted that she had enrolled her children in Northlake schools. On 9/01/2017, the participant contacted the OIG and indicated she was planning on voluntarily vacating her unit.

The OIG investigation was referred to the Property Office. The participant vacated her Public Housing unit on 10/20/2017.

E. SIGNIFICANT INDICTMENTS

An OIG investigation resulted in one criminal indictment this quarter. The following is a summary of this case.

Olumide Runsewe

Olumide Runsewe (Runsewe) was indicted on 10/03/2017 by a Cook County Grand Jury for fraudulently obtaining housing benefits from the CHA. Runsewe was charged with two felony counts of theft and two felony counts of forgery. The indictment alleged that between 12/2013 and 04/2017, Runsewe failed to disclose income, failed to notify the CHA of changes in household dependents and failed to notify the CHA of his marriage in 2014 as well as his spouses' income. It was further alleged that Runsewe presented a false document to the CHA that was purportedly from the United States Post Office as well as a false document that was purportedly a court order signed by Judge Cesario (Judge Cesario had retired prior to the date of the court order). The case is being prosecuted by the Cook County State's Attorney's Office.

F. CLOSED INVESTIGATIONS SYNOPSIS

An OIG investigation can be either administrative, criminal or both. Administrative investigations generally involve violations of HUD regulations and/or CHA rules, policies or procedures. For sustained administrative investigations, the OIG prepares a summary report of the investigation and its findings. These summary reports are presented to the CEO and the impacted department to facilitate an appropriate resolution. They are available upon request to the Audit Committee. In order to maintain confidentiality and integrity of the pending investigations, the OIG has omitted any information on pending/open investigations.

In criminal investigations, if there is sufficient evidence gathered for potential prosecution, the investigation will be presented to a prosecuting agency for review. In the event a tenant fraud case is declined by the prosecuting agency, the evidence obtained can be referred to CHA departments for appropriate administrative sanctions including termination of participant's voucher, debarment, or civil action remedies.

CLOSED CRIMINAL CASES

Two criminal cases were sustained and closed. One case was declined. The following is a summary of the sustained criminal cases.

Maurice Mills

The CHA OIG received a referral from Social Security Administration (SSA) OIG on 2/29/2016 regarding CHA resident Maurice Mills (Mills) who was a resident at Lincoln Perry Apartments. Mills had been a resident of Lincoln Perry Senior Apartments since January 2012. SSA OIG had determined that Mills was also receiving retirement benefits under the name of R. G. with a different SSN and an address in Elgin, IL.

The investigation determined that Mills created a second identity in order to gain two types of benefits from the SSA. Using that second identity, Mills obtained Retirement Insurance Benefits (RIB) from the SSA in 2008. In 2010, under Mills' regular identity, he obtained Supplementary Security Income (SSI) from the SSA for a back injury. From 2008 to the present, Mills received over \$43,000 in benefits from the SSA that he was not entitled to.

In December of 2011, Mills applied for housing benefits from the CHA and was accepted into a CHA Senior Public Housing building in January 2012. Mills provided false information to the CHA by failing to disclose his extensive criminal history and by failing to report the correct amount of income he was receiving in both RIB and SSI benefits from the SSA as well as other income from his second identity. Mills received over \$34,000 in benefits from the CHA that he was not entitled to.

The investigation was referred to the Illinois Attorney General's Office jointly by the SSA OIG and the CHA OIG in June 2016. Mills was indicted by a Cook County Grand Jury on 8/16/2017 and charged with 5 felony counts including two counts of Theft, State Benefit Fraud, Wire Fraud and Forgery.

On 11/14/2017, Mills pled guilty to count 1 of the indictment, which was the offense of Theft relating to his CHA benefits, in violation of Chapter 720 Act 5 Section 16-1 (a) (2) (A) of the Illinois Compiled Statutes. The count was reduced to a misdemeanor and Mills was sentenced on 11/14/2017 to 1-year conditional discharge.

The OIG has referred this matter to the CHA Legal Department to initiate eviction proceedings against Maurice Mills for defrauding the CHA.

Latoya Williams

The CHA OIG initiated an investigation on 9/27/2012 related to HCV participant Latoya Williams (Williams) of 1241 N. Monitor Ave, Chicago, IL 60651 and her husband Michael Fort (Fort).

The investigation revealed that between June 2008 and October 2012, Williams was the HCV participant in a unit owned by Fort, who received a monthly HAP from the CHA related to Williams' voucher. It was determined that Williams never occupied the unit and was living at another address with Fort in Palatine, IL. The HCV unit was rented to a third party and Fort collected tenant monthly rent as well as the HAP. The CHA incurred a financial loss of \$63,138.

On 10/29/2013, the Cook County State's Attorney's Office filed a four-count indictment against Williams (Case Number: 2013 CR 2061602) and an eight-count indictment against Fort (Case Number: 2013 CR 2061601).

On 11/17/2017, Williams pled guilty before the Honorable Judge Alfredo Maldonado to one count of Theft by Deception. Williams was sentenced to 30 months of probation, 45 days of community service, and ordered to pay restitution totaling \$10,000 to the CHA.

On 11/17/2017, Fort pled guilty before the Honorable Judge Alfredo Maldonado to one count of Theft of Government Funds. Fort was sentenced to 18 months in the Illinois Department of Corrections to run concurrent with an unrelated conviction under case number 2016 CR 0438101. Fort received credit for 494 days that he was incarcerated during his court proceedings.

CLOSED ADMINISTRATIVE CASES

Four administrative cases were closed and sustained. One case was closed and not sustained. The following is a summary of the two significant sustained cases.

OIG Ref #2017-03-00031

On 3/20/2017, the OIG received a complaint that CHA voucher holder had been renting a unit for the past 14 years from her sister. Initial analysis revealed that the participant was a Housing Choice Voucher (HCV) participant and the sister was listed as the landlord of the unit. Analysis also revealed that on 7/14/2016, the HCV Department sent a notice to the tenant to confirm whether or not she was related to the property owner. There was no response to the notice. The property owner had received over \$87,000 in Housing Assistance Payments (HAP).

The Cook County Recorder of Deeds reflects that in February 1998, the HCV unit was transferred to both the landlord and the participant from their father. In December 2001, the HCV participant transferred her interest in the property to her sister. The HCV participant had applied for housing benefits in September 2001 and was admitted into the HCV program in April 2002.

The OIG interviewed the landlord in May 2017 and the HCV participant in July 2017. Both parties were uncooperative and both individuals denied that they were related to each other.

The HCV participant provided her birth certificate to the CHA during the initial application process. The OIG obtained the landlord's birth certificate in August 2017. The birth certificates confirmed that the HCV participant and the landlord were in fact sisters.

As a result of the OIG investigation, the HCV participant sent a letter to Nan McKay and Associates (A CHA vendor administering the HCV program) on 8/22/2017 relinquishing her voucher. The OIG referred the investigative report to the HCV Department and the HAP payments were suspended. In addition, the HCV Department has sent an overpayment notice to the property owner in the amount of \$87,007.

OIG Ref# 2016-02-00047

A CHA OIG investigation was initiated on 2/22/2016. The investigation was related to an allegation the OIG received that an HCV participant had failed to report her marriage and had resided in the HCV unit with her husband for over 8 years. The complaint further alleged that the husband had an income in excess of \$40,000 per year and the participant had failed to report the income to the CHA.

The investigation revealed that the participant had been married since February 2007 and that during the entire time, her husband was employed. The participant never identified her husband as a household member or reported his income at any bi-annual re-examination with the CHA.

An Intent to Terminate (ITT) Hearing was conducted and a decision to terminate the participant's housing assistance was entered based on the investigative findings. Based on several factors, the determination was made to not present the case for criminal prosecution.

G. CLOSED AUDITS AND REVIEWS SYNOPSIS

The investigative team continues to rely heavily on the audit and analytics team for investigative support in financial frauds and forensic accounting matters. This support is critical to allow the OIG to conduct and lead multi-jurisdiction, complex investigations. The audit staff's support on investigative matters will continue to be an integral part of OIG investigations.

The OIG is finalizing the Property Rental Assistance Waitlist Audit. Below is CHA management's response for the Public Housing Over Income audit that was completed this quarter.

Public Housing Over Income

As part of the OIG 2016 Audit Program Plan, the OIG conducted an audit of the Public Housing over income population. The audit's main objectives were to determine the extent to which subsidized public housing units are occupied by over income families; to review CHA's internal controls and procedures as it relates to the review, approval, and processing of rent calculation; and to determine whether CHA is in compliance with HUD's rent requirements.

All departments impacted by this audit cooperated fully with the OIG staff. The Property Office responded to the OIG's report and is currently making process improvements to ensure compliance with HUD once it issues its final rule making on over income families receiving public housing. Below is management's response for the observations noted in the report.

Observation: Over Income Families - Risk Level: Low

Over Income Families -124 families out of 220 (56%) are 120% over income.

Recommendations:

Implement HUD's H.R. 3700 – 114th Congress (2015-2016) TITLE I section 103--SECTION 8 RENTAL ASSISTANCE AND PUBLIC HOUSING

Management Response:

The Property Office concurs with this observation. The noted recommendation is consistent with the over income public housing tenancy requirements as established by the Housing Opportunity Through Modernization Act (HOTMA). PHAs, however, are unable to implement the provisions of this statute without HUD's issuance of final rule making on the policy.

Observation: Incomplete Tenant Files - Risk Level: High

Incomplete tenant files-13 out of 20 family files and 2 out of 10 senior files were incomplete. During the fieldwork:

- CHA was going through a transition period of Private Property Management (PPM) firms in 2016.
- Realty & Mortgage and McCormack Baron staff did not have access to the Enterprise Income Verification (EIV) System.

After completion of the audit fieldwork (where files were noted to be incomplete) the above conditions have been corrected by the Property Department.

Recommendations:

Management should strengthen internal controls to ensure all the required documents are completed and maintained in the tenant file in order to comply with HUD's Handbook 4350.3 Occupancy Requirements of Subsidized Multifamily Housing Programs as it relates to the record retention requirements.

Management Response:

Property Office concurs with observation and recommendation. Property Office portfolio managers will conduct 1% monthly and 12% annually tenant file audits utilizing the YARDI Audit Tool.

Observation: HUD'S Rent Requirements - Risk Level: Low

1. HUD's rent Requirements-Approximately 1,000 CHA residents (6% of households) will be affected by HUD's new Flat Rent requirement. Limited testing was conducted for the rent requirements due to the new HUD requirement.

2. Henry Horner has been under a consent decree since 1995. As of February 2017, the consent decree was still active. The site has 286 families. Due to the consent decree, out of the 286 families, 158 (55%) are not paying 30% of the adjusted gross income. Residents at Henry Horner are currently paying ceiling rent from the 2003 schedules.

Recommendations:

1. Continue implementing HUD’s flat rent requirements.
2. Review the consent decree to determine if the residents at Henry Horner can start paying 30% of the adjusted gross income.

Management Response:

Property Office concurs with part of the observation and recommendation, however, at this time we cannot require Henry Horner implement flat rent requirements until all phases are completed and total unit count under this decree is satisfied.

H. ADVISORIES

The OIG issued five advisory reports to CHA during this quarter. The OIG issues advisories when systemic or high risk conditions are identified by the OIG during the course of audits, data analytics and/or investigations. Once the advisory is issued to CEO Eugene Jones, internal stakeholders are identified to address the concern raised in the advisory.

Advisory #	Description/Summary
10	Recommendation to CHA based on an analysis of P.O. Boxes
11	Recommendations for CHA’s Lead Inspection Process
12	Security Recommendations for Master Keys
13	Security Recommendations for Identification Badges
14	Recommendations for Compliance with Illinois Identity Protection Act

The following is a summary of the above listed advisory reports:

Advisory 10: P.O. Box Analytics

Due to addresses being a critical data field when searching for shell companies, fictitious vendors or potential landlord/tenant collusion, the OIG conducted an analysis on the use of a P.O. Box by a landlord, contractor, subcontractor or vendor. Specifically, the legitimacy of a vendor is decreased when they do not have a physical, geographical location for their business or operation. Thus, the OIG recommended that all vendors provide the CHA with a physical address in addition to any P.O. Box they may provide.

Advisory 11: Lead Inspection Process

The OIG reviewed the lead testing protocol for HCV and Public Housing and found that CHA is in compliance with current HUD regulations; however, it is anticipated that significant changes will occur in the near future due to recent developments and emerging issues about lead in public housing agencies nationwide. In anticipation of these changes and to avoid the risks associated with housing families in a toxic hazardous environment, the OIG provided both departments with recommendations to consider for implementation. The OIG will meet with

the relevant CHA departments to discuss recommendations and its potential impact on building operations.

Advisory 12: Security Recommendations for Master Keys

The OIG reviewed CHA's key-control process and found that appropriate policies and procedures which governed the control and security of the master keys at CHA headquarters did not exist. The appropriate protocol was also not in place for when key control is compromised. The OIG made several recommendations to strengthen CHA's security access controls and the appropriate stakeholder concurred with the OIG's findings.

Advisory 13: Security Recommendations for Identification Badges

The OIG conducted a physical security access audit regarding the use of identification badges (ID badges) and ID badge reader technology. The OIG found that four employees had unrestricted access (Master Access) to all areas within the CHA, as well as identified that no rules existed defining the circumstances under which Master Access was granted, or rules regarding the use of that special access. The OIG made numerous recommendations to ensure only authorized personnel are allowed in a designated area. The recommendations, however, do not impact the necessity for entry into restricted space in the case of an emergency, or any issue involving the safety and security of CHA employees. The appropriate stakeholder concurred with the OIG's findings.

Advisory 14: Illinois Identity Protection Act

The OIG reviewed CHA's confidentiality and security requirements to ensure compliance with the Illinois Identity Protection Act (5 ILC 179). This Act was created to control the collection and use of Personally Identifiable Information (PII), such as social security numbers, dates of birth and addresses, at public institutions and agencies. As a result of the review, the OIG made several recommendations to enhance integrity in the agency's information security. The OIG discussed this matter with CHA management. Management concurred and will develop an action plan to address the risks identified in the advisory.

I. ANALYTICS

The following are the significant data analytic initiatives for this quarter:

Registered Sex Offender List Analysis

As part of a quarterly analysis, the OIG continues to identify the number of lifetime registered sex offender names (offenders) listing a public housing or HCV address, pursuant to the *Quality Housing and Work Responsibility Act of 1998 (Section 578)*.²

² This Act became effective on June 25, 2001.

Quarter 4 Results

The OIG found 11 lifetime offenders who listed a HCV or a public housing address on the registry for this quarter.³ Two of the newly identified offenders registered at the same address as a HCV participant and were not listed as a household member to the according participant's voucher. As a result, HCV has sent each participant a notice requesting proof of residency for the offender and must provide documentation showing the subsidized address has been removed from the registry. There were 2 new registered sex offenders who listed a public housing address. One identified offender is a CHA head of household, while the other participant may be an unauthorized occupant.

The additional matches identified (7 out of 11) were found in previous quarterly analyses. This indicates that these offenders have yet to change their address on the registry. To date, over 60% of offenders (30 out of 48) have changed their address, as required by CHA, since being identified.

Status from Previous Quarterly Analyses

Enforcement Action (Tenants)	Total (48)
Terminated	4
ITT	0
PAC Agreement or Warning Notice	11
Waiting for Verification	11
Settlement Agreement	1
No Further Action	21
Total	48

Red Flag Analyses of Landlord/Tenant Collusion

The following table provides a status on the investigations that were opened based on various red flags of landlord/tenant collusion:

Enforcement Action	Total (16)
Investigation Pending	4
Investigation Not Sustained	4*
Investigation Sustained	8

³ If an offender did not identify an apartment number, the residence type was not categorized as a single-family home, the last name of the offender did not match the tenants' last name, and/or the offender is not compliant with the registry then it was not considered a "match".

**One not sustained investigation was still referred to the HCV Department for appropriate action.*

The table below further specifies the status of cases that were closed and referred:

Enforcement Action	Total (9)
Pending HCV Department Review	1
Pending CHA Legal Department Review	3
Approved Reasonable Accommodation (RA) Request	3*
Restitution	1
Terminated	1

**In addition to the approved RA, the participant is requesting to move from his current unit.*

The OIG continues to conduct analyses on various known fraud indicators. During this quarter, the OIG provided support to the HCV department on 15 matters after having identified potential program violations, such as renting from a relative, unreported income and/or unauthorized occupants. The OIG also issued an Advisory this quarter based on a previous quarter's red flag analysis of landlord/tenant collusion regarding the use of a P.O. Box by a landlord (See Advisory 10 for details).