U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

ASSISTANT SECRETARY FOR CONGRESSIONAL
AND INTERGOVERNMENTAL RELATIONS

JUL 23 2010

The Honorable Charles E. Grassley
Ranking Member
Committee on Finance
United States Senate
Washington, DC 20510-6075

Dear Senator Grassley:

On behalf of Secretary Shaun Donovan, thank you for your follow up letter of June 16, 2010, regarding the implementation of the American Recovery and Reinvestment Act of 2009 (Recovery Act). The Department of Housing and Urban Development continues to provide technical assistance to grantees and to actively oversee the Capital Fund Recovery Act funds to ensure that they are expended timely and in accordance with the statutory and regulatory requirements. HUD's commitment to transparency and accountability is clearly demonstrated by its extensive and thorough monitoring process and attention to Public Housing Authorities (PHAs) designated as troubled.

A. Transparency and Accountability

The Department appreciates your suggestions about making the Public Housing Assessment System (PHAS) scores available to the public. As indicated in HUD's earlier letter, the Department plans to post the PHAS scores on the HUD website as part of President Obama's Open Government Initiative; the Department will be making all PHAS scores available to the general public on HUD's website at: www.hud.gov within calendar year 2010. Troubled Agencies will be identified by their PHAS scores. HUD is considering the data elements proposed in your letter with respect to troubled agencies. Some of the information requested in your letter is already online and available to the public including the location of the PHA and the total number of units. This information is available through the Office of Public and Indian Housing's (PIH) webpage at: http://www.hud.gov/offices/pih/systems/pic/haprofiles/. In addition, all HUD Recovery Act awards are listed online with the grantee name and associated award amount at: http://portal.hud.gov/portal/page/portal/HUD/recovery/programs. However, this information does not differentiate between troubled and non-troubled agencies. As the Department transitions fully to asset management, and given the fact that a new PHAS rule is pending, HUD is in the process of assessing the relevance of the different data elements for public consumption as they relate to troubled PHAs, and your suggestions will be an important part of that assessment process.

The Department fully understands the importance of transparency for accountability purposes and to ensure that federal funds are spent appropriately. HUD's commitment to transparency and accountability is not only demonstrated through its comprehensive monitoring and oversight of Recovery Act funds for all PHAs, including those that are troubled, but also through its high recipient reporting rate in the Federal Reporting system. As you know, FederalReporting.gov is the central government-wide data collection system used to collect information from recipients of federal awards under Section 1512 of the Recovery Act, and is used to provide transparency to the public regarding the use of Recovery-related funds. HUD has consistently had one of the highest Recovery Act recipient reporting rates among federal agencies. Specifically for our PHAs that received Capital Fund Recovery Act funds, reporting rates have continued to increase since the initial reporting period, from 95.6 percent in October 2009, to 99.04 percent in January 2010 and 99.5 percent in the most recent reporting period in April 2010. Reporting is currently underway for July and both PIH and HUD expect similar levels of performance and commitment to transparency and accountability through reporting. Between the recipient reported data, the comprehensive monitoring plan put in place by the Office of Field Operations (OFO) within the Office of Public and Indian Housing and the audits performed by the Office of the Inspector General (OIG) and the Government Accountability Office (GAO), HUD is working actively to prevent fraud, waste and abuse of taxpayer dollars. Also, HUD's monitoring process detects potential compliance issues in order to facilitate resolution of any problems. In addition to the OIG reports cited in your letter, the GAO has been thorough in their 60-day investigative Recovery Act reports to Congress. In the course of evaluating the Public Housing Capital Fund Recovery Act program, the GAO has teams visiting headquarters, field offices and PHAs across 16 states and has published 6 reports to date and is currently working on their Round 7 report.

HUD also understands your concern about the 13 Troubled PHAs highlighted in your letter that received $94 billion in Recovery Act funds and were categorized as "high" risk by HUD. As a part of HUD's troubled PHA monitoring strategy, HUD used a risk model to assign troubled PHAs one of three risk levels: low, medium or high. Each risk level has an associated baseline strategy for providing technical assistance, monitoring and oversight related to the use of the Recovery Act funds. These risk designations were generated for the purposes of providing targeted monitoring and oversight as a part of an internal control process that is not an official designation and bears no impact on the PHA performance rating in PHAS.

B. Responsiveness to March 15, 2010 Letter

HUD has proven to be committed to accountability and transparency, particularly with the Recovery Act, as demonstrated by our responsiveness to inquiries from the GAO, the OIG and your office. As noted in HUD's previous response regarding the OIG reports, HUD is involved in addressing and resolving the OIG findings. HUD provides follow-up responses to such findings and recommendations in the form of decision memoranda and also provides supporting documentation to close out findings that have been addressed. The OIG must concur that the items have been properly resolved in order to close out the finding. In response to your concerns, this letter provides additional clarification below:

- The OIG report for the Puerto Rico Public Housing Administration (PRPHA) contained 3 findings with 10 associated recommendations. The three findings covered the management of the Capital Fund Financing Program, financial management compliance with HUD requirements and the use of Recovery Act funds. Pursuant to the standard protocol, HUD and the OIG agreed upon HUD's management decision (also referred to as an action plan) that outlined the corrective actions that have been or are being implemented to address seven of the recommendations. However, HUD did not agree with three of the recommendations (1A, 3A, and 3B).

  The OIG accepted HUD's management decision to defer three of the recommendations until a legal opinion could be generated by the Office of General Counsel (OGC) to determine whether the actions cited in the findings are permissible and consistent with the appropriate statutory and regulatory requirements. Upon receiving the OGC legal opinions which supported HUD's initial position on the recommendations, the OIG requested that the General Counsel and the Chief Financial Officer provide a coordinated opinion on the matter. The General Counsel and the Chief Financial Officer issued a joint opinion in contrast to OIG recommendations. HUD is awaiting a response from the OIG with the expectation that the three open recommendations will be closed.

  Your letter cites specific concerns related to a finding in which the OIG believed that the PRPHA may have supplanted expenditures inappropriately from other sources using Recovery Act funds, which is prohibited in the statute. Your letter cites an interest in Recommendation 3A where the OIG indicated that funds were obligated to five contracts and then supplanted by Recovery Act funds. Upon review, OGC determined that the PRPHA entered into contracts without having identified an eligible source of funding, and as a result had not entered into legally binding agreements that meet the federal definition of "obligation". This determination is supported by the Office of the Chief Financial Officer at HUD. Therefore, in this instance HUD maintains that repayment is not necessary since the obligation was appropriate and has requested that the OIG close out this finding. For additional detail, please review the legal opinion provided for the PRPHA report included in the OIG supporting documents you requested (Enclosure A).

- Senator Grassley also expressed concern about the Housing Authority of New Orleans (HANO) which HUD addressed in the previous letter. Specifically, his letter cited known cases of fraud involving previous PHA officials who have since been prosecuted. As you state in your letter, this PHA is under administrative receivership and has a team of nationally recognized consultants providing technical assistance for all aspects of operations including financial management. With regard to your concern about HANO's Recovery Act funds, HUD conducted and continues to perform thorough reviews of the PHA's procurement policy, obligations, expenditures and compliance with the statutory requirements.

- All findings have been addressed and were officially closed out by the OIG for the Miami Dade Housing Authority (MDHA) earlier this year. The MDHA provided documentation to support that they were in compliance with the Recovery Act procurement requirements and priorities. The follow-up letter from the Senators expresses concern about whether the MDHA is prioritizing the use of stimulus funds appropriately. The MDHA is using its Recovery Act grant to do renovations in 82 public housing developments including replacing roofs, windows and fire alarm systems in addition to modifying units to make them compliant with the Uniform Federal Accessibility Standards. Not only are these investments eligible uses of funds under the Capital Fund Recovery program, but they are also improving the quality and energy efficiency of the public housing stock for low income residents. Enclosure B contains documents that demonstrate how the MDHA fully addressed the concerns raised by the OIG which led the OIG to close out the findings. HUD's local field office will continue to work closely with the PHA as it completes project work and expends the remaining grant funds. Further, the MDHA will receive another on-site review during the second year of monitoring; this is in addition to other on-going oversight and technical assistance provided.

C. Accuracy of Troubled Housing Designations

HUD agrees with your statement that the OIG audits and capacity reviews are important elements of HUD's overall review process to ensure PHAs are able to successfully expend federal funds, including Recovery Act dollars. To clarify HUD's intention in the first letter, while the OIG reports offer important insight on potential weaknesses in grantee performance, many of the OIG reviews cited were conducted before the Recovery Act. Thus, the findings may not be direct indicators of Recovery Act implementation, particularly if they have since been addressed, corrected and closed out. However, HUD does take the OIG findings seriously and provides decisions for each material finding and works with the grantees to resolve any deficiencies. HUD understands your point about the relevance of all findings to the expending of Recovery Act funds and assures you that all of the OIG findings, regardless of whether they are related to the Recovery Act, are addressed and corrected as applicable.

Similarly, HUD devotes additional attention to its troubled housing portfolio. Given Senator Grassley's interest in the troubled PHAs that received Recovery Act funds, HUD provided the troubled list used at the time awards were made as that seemed to be most responsive to his request. The troubled list has since been updated as the PHAS scores change annually and PHAs are added or removed from the troubled designation. As noted previously, 171 PHAs were designated troubled in February 2009, at the time Recovery Act awards were prepared. HUD added one administrative receivership, not already on the troubled list, to ensure it received the enhanced monitoring. This means the initial baseline for the troubled designation at the start of the Recovery Act was 172 PHAs. Over the course of the first year of the Recovery Act, 32 PHAs were removed from troubled status due to improvements in management and

performance and 12 additional PHAs were designated troubled. As a result, 152 troubled PHAs now appear on the troubled list going into Year 2 of the Recovery Act monitoring. The below table summarizes the movements through May 2010:

February 2009 troubled list	Recovered PHAs March 2009 – May 2010	PHAs designated troubled March 2009 – May 2010	May 2010 troubled list
171[1]	32	12	151[2]

As you note in your letter, PHA deficiencies are organized into several categories including: Troubled, Substandard Financial, Substandard Physical, and Substandard Management. Per your request, HUD has included both the list of troubled PHAs from February 2009 and the updated listed from May 2010 with the associated deficiencies in Enclosure E.

The Chicago Housing Authority (CHA), the Housing Authority of Kansas City (HAKC) and the Virgin Islands Housing Authority (VIHA) are each under receivership. Since the VIHA is under an administrative receivership, it was included in HUD's troubled list for monitoring as part of the list of 172 that was provided to Senator Grassley previously. However, it is true that the CHA and the HAKC were under judicial receivership and are not listed on HUD's troubled list. These agencies were considered standard performers under PHAS and therefore did not have troubled status. The CHA receivership resulted from litigation over fair housing issues. The Court limited the scope of the receivership to the development of new family (exclusive of elderly) public housing units. The receivership does not extend to the ongoing administration of existing public housing units and therefore did not impact PHAS scores. The Court overseeing the receivership recently ruled that the receivership will terminate by May 31, 2013, and established a transition period that began on June 1, 2010.

As noted in your letter, there are two basic types of receiverships: administrative and judicial. Administrative Receivership is a process whereby HUD declares a PHA in substantial default of its Annual Contributions Contract, and takes control of the PHA under the powers granted to the HUD Secretary under the United States Housing Act of 1937, as amended (1937 Act). As part of this process, HUD appoints staff or procures the services of a contractor/consultant to work on-site at the PHA, to manage and administer the PHA's housing operations and conduct the affairs of the PHA. Alternatively, judicial receiverships are established, monitored and supervised by federal or state courts. The three judicial receiverships

[1] From HUD's first letter, the PHAS troubled list included 171 PHAs. The East St. Louis PHA was not designated troubled as of February 25, 2009 under PHAS but is included on the list receiving enhanced monitoring because it was under HUD administrative receivership. Therefore the list provided to Senator Grassley included this PHA.

[2] Similar to the February 2009 troubled list, East St. Louis was added to the list for monitoring purposes and therefore the list provided shows 152 troubled.

no longer meet the HUD designation of "troubled". However, it should be noted that HUD has continued to track the Recovery Act grant performance of the PHAs in judicial receiverships to ensure timely obligation and expenditure in accordance with the statute.

It is also worth noting that in 2007, PIH formally established the Office of Receivership Oversight (ORO) to focus exclusively on providing oversight and direction for receiverships. The ORO oversees and manages the recovery and turnaround of housing authorities under HUD administrative receivership, leading to the eventual return of the PHAs to local control. The ORO also provides limited compliance oversight of the three judicial receiverships. Once returned to local control, the OFO resumes oversight of the PHA as they do with all other PHAs.

D. Abuse of Recovery Act Funding and Other PHA Concerns

As outlined on HUD's website and in the related PIH processing notices, the Recovery Act funds are intended to carry out capital and management activities for PHAs, as authorized under section 9 of the 1937 Act. The majority of grantees expend the funds in accordance with the Recovery Act requirements. As it relates to Troubled PHAs, the Recovery Act provided the Secretary with the authority to decide whether to provide troubled Public Housing Agencies (PHAs) with Recovery Act funds. The Secretary agreed with PIH's recommendation that troubled PHAs needed this funding in order to improve their inventory and engage in much needed capital and management activities. As discussed in the response to Senator Grassley's earlier letter, it was agreed that troubled PHAs would require enhanced monitoring and oversight in order to meet the Recovery Act obligations.

In response to the Fort Myers Florida Weekly article you attached to your letter regarding the Housing Authority of the City of Fort Myers (HACFM), HUD is committed to ensuring that all of its grantees follow the highest standards of good stewardship, transparency and compliance around the use of taxpayer funds. The use of Recovery funds for the administrative building also raised concerns for us and therefore HUD undertook a full review of the matter.

The PHA received $2,219,810.00 in formula funds and $3,635,000.00 in competitive funds. The PHA is using the competitive grant to help fill a funding gap in a HOPE VI project where bond sales were resized after the first phase of a five phase development for 470 units of senior and family housing. These funds will help fill the gap during the second phase and rebalance the budget, thus further assisting seniors and low-income residents in need. The formula funds are being used for the construction of the administrative building. Our review has determined that this is an eligible use under the Capital Fund Recovery Grant (CFRG) program, though, as described below, HUD will be conducting a further review of these expenditures.

The HUD Processing Notice PIH 2009-12 entitled "Information and Procedures for Processing American Recovery and Reinvestment Act Capital Funds Formula Grants," issued on March 18, 2009, states that Public Housing Agencies (PHAs) must use the funds on Capital Fund eligible activities identified in either the Annual Statement or 5-Year Action Plan. In general,

the construction of an administrative building is an eligible use under the Capital Fund program. In the case of Fort Myers in particular, the construction of an administrative building was already included in the existing approved PHA 5-year plan and approved annual statement as required and HACFM made local decisions which are within their discretion. However, while the activity that HACFM undertook was eligible, HUD will as mentioned further review all expenditures related to the administrative building to ensure that the funds were spent in accordance with all statutory and regulatory requirements.

The local HUD field office so far has conducted two reviews of the HACFM utilization of Recovery Act funds. The first was a remote review completed on December 22, 2009. This review resulted in the identification of only one deficiency related to the Buy American provisions. The contract was modified shortly thereafter to include the required Buy American provisions. The second review was completed on-site on January 27, 2010, as a follow up to the remote review and did not result in any findings.

As noted in your letter, there are also some unfortunate cases where recipients do not fully comply with HUD requirements. HUD has been highly proactive in employing a comprehensive monitoring strategy that provided standardized review for 100 percent of Recovery Act grantees (3,119 PHAs) with additional review, guidance and technical assistance provided on an on-going basis. You specifically reference the findings for the Sanford Housing Authority (SHA). Although the allegations cited are serious, it is important to note in the context of this letter focused on the Recovery Act that the potential misuse of funds cited in the article were not Recovery Act dollars.

The SHA was awarded $1,010,000 in formula funds under the Recovery Act, which are being used to replace sewer lines, renovate 6 fire damaged units, repair vacant units and install furnaces, carbon dioxide detectors, and new appliances among other renovations. The SHA has required significant monitoring and technical assistance from the local HUD field office for the Recovery Act implementation. Given their troubled status, HUD has placed the PHA on a zero threshold review which means that the field office must review and approve Recovery Act related obligations and expenditures prior to the PHA accessing the funds from the electronic Line Of Credit Control System (LOCCS). In this way, HUD is performing its due diligence to monitor the use of funds.

However, an audit of non-Recovery Act funds conducted on June 30, 2009, by an Independent Public Accountant (IPA) found a lack of controls over credit card use including lack of receipts and miscellaneous charges (to be reimbursed) made to the card. Further, a HUD review of credit card usage revealed various industry related trips and lodging charges as well as other charges. The Executive Director indicated the travel was approved by the board and was for the benefit of the SHA (educational seminars, workshops, training, meetings, etc.). However, HUD advised both the Executive Director and Board Chair that based on the audit finding and HUD's review, the travel-related activities did not appear to be a prudent use of funds considering the financial condition of the SHA. It is important to note that recently both the

Executive Director of SHA cited in the article, and a member of the board of commissioners, have resigned. While it is true that the SHA has had financial management issues, they are being given enhanced oversight and technical assistance based on their troubled status, especially in the use of the Recovery Act funds as well as other agency programs.

In the case of the HANO, it should be noted that because it is a troubled agency, in addition to conducting remote and on-site reviews, HUD also reviews and approves all obligations and expenditures prior to releasing them to the PHA. In this way, HUD is closely monitoring the use of the $34.5 million Recovery Act dollars and providing technical assistance and guidance as needed. The PHA is using the funds to rehabilitate hundreds of public housing units at scattered sites and for the construction of new units.

As you will find in the Department's responses to the additional questions raised in your letter which are enumerated below, HUD has put systems in place to effectively assess and monitor risk. In the case of the Recovery Act, HUD has taken significant measures to ensure that the funds are being used for the intended purposes: to improve the availability of the affordable housing stock, spur economic growth and create jobs. In the course of the monitoring process, grantees with compliance issues are identified and addressed on a case-by-case basis to ensure funds are being used appropriately.

The following responses address the additional questions raised in your letter:

1) Describe how a determination is made as to whether a PHA, which is in receivership, is or is not included on the troubled housing authority list.

   The reason that only some receiverships are on the troubled report is due mostly to performance scores. The performance score is what determines if a PHA is designated as troubled or not. Receiverships are based on judicial and/or administrative actions that rely on a variety of indicators including the PHAS performance score, economic stability of the geographic area, and management capacity. With oversight by HUD or the federal court, such PHAs should improve their PHAS scores. Moving successfully out of a troubled designation allows receivership to end and return of the PHA to local control.

2) Provide copies of all reports, reviews, evaluations or audits done by the Office of Public and Indian Housing and/or a third party contractor regarding the use of stimulus funds by PHAs.

   Enclosure C contains summary data about the Recovery Act monitoring reviews conducted in the first year of the Recovery Act. It is clear from the number of reviews conducted, that the oversight provided was extensive. Given that 3,829 standardized reviews took place in the first year and each review has at least 30 pages of associated documentation that would require significant staff time to compile and format for this request, all reviews conducted to date are not attached to this letter. Instead HUD is

providing the list of all reviews conducted including dates and types of reviews conducted based on the monitoring strategy along with sample checklists used for troubled and non-troubled remote and on-site reviews (Enclosures C2-C5). It should be noted that a quality control and quality assurance process was initiated to further ensure that the funds are being used for authorized activities and to ensure that program goals are achieved. A total of 395 quality control reviews were completed for all troubled agency reviews (172) and a random sample of non-troubled agency reviews (223).

3) Provide all material provided to the OIG demonstrating that the Miami-Dade and Syracuse PHAs, as well as the other PHAs reviewed over the previous 12 months, have fully addressed the concerns earlier identified by the OIG.

   All materials provided to the OIG including action plans and evidence for closure and legal opinions for Recovery Act reviews conducted over the past 12 months are included in Enclosure D unless otherwise stated in this letter. The enclosure includes all supporting materials uploaded by the OIG to a shared database called ARCATS. The enclosures show documents uploaded to date in cases where HUD has provided materials to close out a finding. This documentation includes information for the MDHA (Enclosure B) and Syracuse PHAs (Enclosure D3), as requested.

4) Provide all material demonstrating that the Puerto Rico PHA has enhanced its internal controls, as well as documentation demonstrating that this PHA is no longer improperly utilizing program funds.

   HUD noted in the letter to Senator Grassley that it has disagreed with certain OIG findings for the PRHA and is following the OIG process for resolving those disagreements. As described in Section B of this letter, most of the findings have been addressed through a corrective action plan. The documentation to support this is included in Enclosures A1 – A2.

5) Provide documentation demonstrating the enhanced oversight being provided to the New London Housing Authority in Connecticut.

   HUD concurred with all of the OIG recommendations cited in Senator Grassley's initial letter regarding the New London Housing Authority (NLHA) and has actively assisted the PHA in resolving outstanding issues. As a troubled agency, the NLHA has received and will continue to receive enhanced monitoring and oversight of the Recovery Act funds in accordance with HUD's Troubled Agency Monitoring Strategy.

   As a part of this review process during the first year of the Recovery Act, HUD ensured that the PHA revised its procurement policy to include all HUD Handbook requirements and Recovery Act requirements. Internal controls have been established to ensure that

adequate quality control, checks and balances, and oversight measures are in place. During the second year of the Recovery Act implementation, HUD staff will be performing additional on-site reviews to ensure that the procedures and controls have been properly implemented and are being followed by the NLHA staff. HUD will also review documentation on-site to support the correction of all matters identified in the OIG report. HUD is also working closely with the PHA to review the internal and financial controls, revise procurement policies, and implement the adopted policies. In fact, representatives from HUD Headquarters met in June in New London with its leadership along with city and state officials to discuss the corrective actions taken to date and to plan for continuing the progress at the NLHA.

It should also be noted that the NLHA obligated all of its Recovery Act funds on time and is on track to fully expend its grant both correctly and timely in advance of the statutory deadline. The PHA is using the funds to perform rehabilitation work including site work on retaining walls at two properties. To demonstrate this oversight per your request, attached are the letters sent from HUD to the PHA stating deficiencies found in the course of HUD conducting on-site and remote reviews (Enclosures D8ii-iv). It is important to note that the PHA has since corrected all deficiencies identified in the above referenced letters.

6) List the criteria used to:
    a. Place a PHA on the troubled housing list;
    b. Remove a PHA from the troubled housing list; and
    c. Place a PHA in or remove it from receivership.

A PHA is designated as troubled based on performance criteria identified in 24 CFR 902. If a PHA has an overall performance score less than 60 or is failing one of the major performance indicators; physical, financial or management, the PHA receives a troubled designation by the Department for that fiscal year. PHAs are removed from the troubled list once they receive a non-troubled performance score. The Real Estate Assessment Center is the HUD entity that compiles year-end data and physical inspection information and compiles a performance score. The PHA will roll off the troubled report once it receives a subsequent standard or high performer score and designation. For judicial receiverships, the receivership ends at the discretion of the court. For receiverships subject to the Annual Contributions Contract (ACC), termination is at the discretion of the Department, generally when a PHA is able to manage and administer its program in compliance with HUD requirements. If the PHA is in receivership due to its troubled designation, the termination is subject to the requirements of Section 6(j) of the 1937 Act.

7) In addition, it was reported that when a PHA is in receivership its duties and responsibilities can fall upon the federal government or others. In light of this:
    a) Identify each PHA currently in receivership;
    b) The date the PHA was placed in receivership;

c) The reason the PHA was placed in receivership; and
d) The name of the receiver and, if the receiver is a non-federal entity, the name of the organization, including how much the receiver is being paid annually and the total paid to the receiver to date.

The table below identifies each PHA currently in receivership, the date it entered receivership as well as the associated type, reason and receiver information. The HANO is the only administrative receivership placed with a non-federal entity through a contract with HUD. As of May 31, 2010, HUD has paid $1,561,831 and the total contract amount is $1,791,929. The current HANO contract is 9 months; it was awarded October 9, 2009 and expired July 7, 2010. The new contract, which was awarded through a competitive solicitation, was awarded on July 2, 2010.

PHAs in Receivership as of June 2010				
Type	PHA Name	Receiver Name	Reason(s) for Receivership	Receivership Start Date
Administrative	Housing Authority of the City of East St. Louis	Elmore Richardson (HUD)	Physical	October 1985
Administrative	Wellston Housing Authority	Patricia Knight (HUD)	Physical	August 1996
Administrative	Virgin Islands Housing Authority	Mirza Negron Morales (HUD)	Financial	August 2003
Administrative	Housing Authority of the City of New Orleans	Gilmore Kean LLC (Contractor)	Physical, Management	February 2002
Administrative	Detroit Housing Commission	Steve Meiss (HUD)	Physical	July 2005
Judicial	Chester Housing Authority	Robert Rosenburg	Physical	August 1994
Judicial	Housing Authority of Kansas City	Jeffrey Lines (Special Master)	Physical	July 1993
Judicial	Chicago Housing Authority [3]	Daniel E. Levin / The Habitat Company, LLC	Physical, Management	May 1995

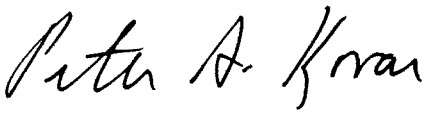
[3] The court overseeing the Receivership ruled that the receivership will terminate by May 31, 2013 and established a transition period that began on June 1, 2010.

8) The Detroit PHA is functioning under a cooperative agreement. Please describe the differences between a receivership and a cooperative agreement. Also, provide an update on Detroit PHAs cooperative status.

The Detroit Housing Commission (DHC) is no longer functioning under a cooperative agreement status, but rather under a HUD administrative receivership oversight structure. The cooperative agreement is a document that reflected the transfer of possession from the DHC to HUD, which resulted in a receivership. The cooperative agreement served as the vehicle for possession to be transferred to HUD. HUD is currently providing the requisite training to the DHC's newly selected Advisory Board members and plans are underway to perform programmatic and operational reviews of the agency's Housing Choice Voucher and Public Housing programs, and to assess progress in the DHC's redevelopment activities. Results from the reviews (i.e., operational, programmatic and development-based) will determine the extent of the DHC's readiness to begin transition planning for return to local control. It should be noted that HUD provides updates to Congress on Administrative Receiverships on a quarterly basis.

Thank you again for your interest and for sharing your concerns regarding the Recovery Act. HUD has worked closely with all of its grant recipients, and will continue to work with them, to ensure they have the guidance, technical assistance, and oversight needed to comply with the requirements and goals of the Act. Transparency and accountability have been especially important throughout HUD's implementation process as evidenced by the information provided here.

Sincerely,



Peter A. Kovar
Assistant Secretary for Congressional
and Intergovernmental Relations

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   iii. Action Plan and Evidence for Closure Rec 1C
   iv. Action Plan and Evidence for Closure Rec 1D
   v. Action Plan and Evidence for Closure Rec 1E
5. Pottsville HA
   i. Email Concurrence with OIG Recommendation, June 21, 2010
   ii. Action Plan and Evidence for Closure Rec 1A
   iii. Action Plan and Evidence for Closure Rec 1B
6. City of Elroy HA

i. Action Plan and Evidence for Closure Rec 1A
ii. Action Plan and Evidence for Closure Rec 1B
iii. Action Plan and Evidence for Closure Rec 1C

7. Travis County HA
   i. Action Plan and Evidence for Closure Rec 1A
   ii. Action Plan and Evidence for Closure Rec 1B
8. New London HA
   i. Email, New London HA Management Decision, February 2, 2010
   ii. ARRA Remote Monitoring Report to New London HA
   iii. ARRA Onsite Monitoring Letter to New London HA, October 5, 2009
   iv. ARRA Onsite Monitoring Report to New London HA, October 5, 2009
   v. Action Plan and Evidence for Closure Rec 1A
   vi. Action Plan and Evidence for Closure Rec 1B
   vii. Action Plan and Evidence for Closure Rec 1C
   viii. Action Plan and Evidence for Closure Rec 1D
9. Winston-Salem HA
   i. Action Plan and Evidence for Closure Rec 1A
   ii. Action Plan and Evidence for Closure Rec 1B
   iii. Action Plan and Evidence for Closure Rec 1C
   iv. Action Plan and Evidence for Closure Rec 1D
10. Dallas HA
   i. Action Plan and Evidence for Closure Rec 1A
   ii. Action Plan and Evidence for Closure Rec 1B
   iii. Action Plan and Evidence for Closure Rec 1C
   iv. Action Plan and Evidence for Closure Rec 1D
   v. Action Plan and Evidence for Closure Rec 1E
   vi. Action Plan and Evidence for Closure Rec 1F
   vii. Action Plan and Evidence for Closure Rec 1G
11. HA of New Orleans
   i. ARRA Project Schedule for HANO
   ii. Action Plan and Evidence for Closure Rec 1A
   iii. Action Plan and Evidence for Closure Rec 1B
   iv. Action Plan and Evidence for Closure Rec 1C
   v. Action Plan and Evidence for Closure Rec 1D
   vi. Action Plan and Evidence for Closure Rec 1E
   vii. Action Plan and Evidence for Closure Rec 1F
   viii. Action Plan and Evidence for Closure Rec 1G
   ix. Action Plan and Evidence for Closure Rec 1H
   x. Action Plan and Evidence for Closure Rec 1I

E. 2009 and 2010 Detailed Troubled Housing List