

PHILADELPHIA HOUSING AUTHORITY

THE OFFICE OF AUDIT AND COMPLIANCE

# ACCOMPLISHMENTS REPORT



APRIL 1, 2014 – MARCH 31, 2016



Janea Jordon  
*Executive Vice President*  
*Office of Audit and Compliance*

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If you have information of possible wrongdoing, call, write, or visit:

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# OUR MISSION

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The Office of Audit and Compliance (OAC) is the Philadelphia Housing Authority's (PHA) independent oversight department established to perform investigative, audit, and compliance-related activities relating to PHA's operations, programs, and services. OAC serves PHA by helping to identify and reduce risks and ensure that policies, procedures, laws, and regulations are followed, established standards are met, resources are used efficiently and effectively, and PHA objectives are achieved.

OAC operates under the general direction of PHA's President and CEO with a direct reporting relationship to the Board of Commissioners. OAC is comprised of a Compliance Department, an Internal Audit Department, and an Investigations Department.

OAC provides the following services:

- Conducts compliance and quality assurance reviews of operating controls and transactions to determine compliance with local, state, and federal laws, regulations, and procedures.
- Conducts performance/operational audits to determine efficiency, economy, and effectiveness of all program areas and operations.
- Conducts criminal and administrative investigations involving allegations of impropriety, fraud, criminal activities, conflicts of interest, waste, and mismanagement.
- Serves as liaison and coordinator of PHA's interests with the U.S. Department of Housing and Urban Development (HUD), local, state, and federal regulatory and investigative bodies.
- Responds to requests from the Board of Commissioners, the President and CEO, and the Senior Management team for independent analyses of management or internal control systems.
- Coordinates audit efforts between internal and external auditors to avoid duplication of efforts.

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# MESSAGE FROM THE PRESIDENT & CEO

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In 2015 the Philadelphia Housing Authority embarked upon a new strategic direction. PHA has returned to its core mission of creating opportunities of affordable housing, economic mobility, and safe, sustainable communities to benefit Philadelphia residents with low incomes. Our new restated mission and new PHA logo reaffirms that we are in fact “Opening Doors to Opportunities.”

The Philadelphia Housing Authority’s Office of Audit and Compliance has been a key contributor as PHA rebuilds trust and transparency among the public, stakeholders, employees and those served by PHA.

OAC’s accomplishments to date have resulted in millions in savings and improvements in PHA’s operational procedures and internal deficiencies. OAC continues to eliminate mismanagement, waste, fraud and abuse through audits, reviews and investigations to ensure the accountability of PHA employees, residents, contractors and those doing business with PHA.

While OAC’s accomplishments are more than noteworthy it is also important to know that PHA cannot do this vital work alone. Our partnerships with federal, state and local agencies along with the support of the Board of Commissioners, HUD and the City have been critical to our success.

I would like to thank each of you for your continued commitment and I look forward to many more years of progress.

Sincerely,



**Kelvin Jeremiah**

President & CEO

*Philadelphia Housing Authority*





# MESSAGE FROM THE EXECUTIVE VICE PRESIDENT

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OAC continues to make great strides in our mission of safeguarding the integrity of PHA, and supporting PHA management in meeting its governance, risk management, compliance and internal control responsibilities.

Over the past two years, OAC continued to build upon our partnership with the Philadelphia District Attorney's Office (DA), evidenced by our joint effort to update the associated Memorandum of Understanding that further codifies the working relationship between our two agencies. In Fiscal Year 2015, 18 arrests were conducted under our joint effort to hold those who defraud the Federal Government accountable. Continuing this determination in Fiscal Year 2016, PHA referred 26 cases to the DA which were all ultimately approved for prosecution. We remain committed to fully prosecuting persons who defraud the agency of federal funds by underreporting income or failing to accurately identify individuals residing in subsidized units.

Our Investigations Department uncovered a little over \$5 million dollars in fraud over the two year period. Our Internal Audit Department continued its annual risk assessment process for the agency, leading to the completion of 24 internal audits over the two year period. The Compliance Department continued to forge partnerships throughout the agency and facilitated multiple external reviews, ensuring that PHA was responding, accurately, timely and transparently. I could not be more proud of all of the aforementioned progress and accomplishments within OAC's departments!

We will continue to push forward in our efforts to minimize fraud, waste and abuse throughout PHA, and we encourage your continued support.

Sincerely,



**Janea Jordon**

Executive Vice President, OAC  
*Philadelphia Housing Authority*



# THE YEAR IN NUMBERS

FINANCIAL ACCOMPLISHMENTS 2015 & 2016	
Internal Audit Recovery (Actual)	\$91,539
Compliance Streamlining	\$211,789
Wage Compliance Recoveries (Actual)	\$121,902
Termination/Resignation Savings	\$1,295,894
Pension Contribution Savings	\$359,177
Restitution (Ordered)	\$277,723
Repayment Agreements (Ordered)	\$801,442
Repayment Agreements (Collected)	\$349,181
Total Amount of Fraud Uncovered through Investigations	\$5,121,108

## REPAYMENT AGREEMENTS

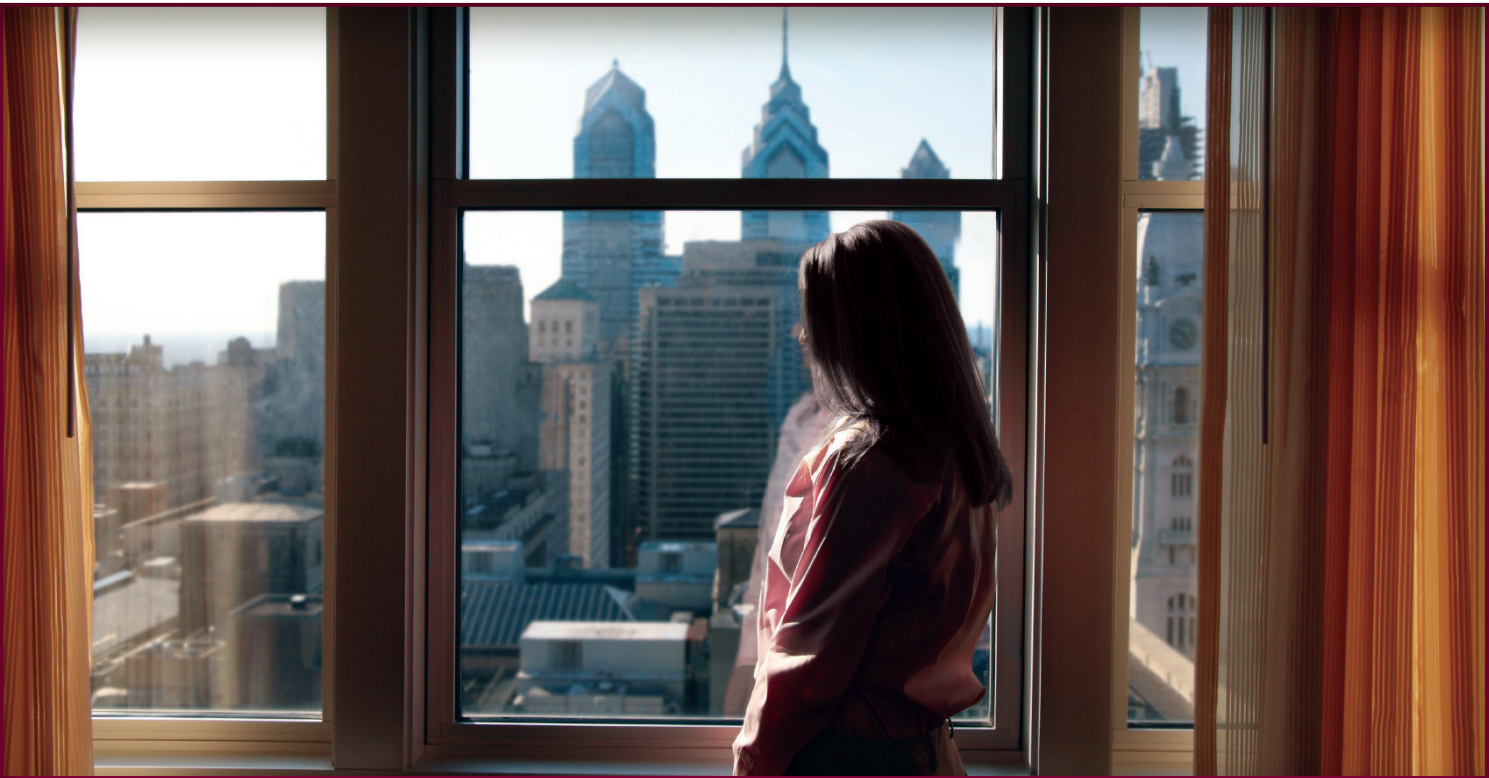
In certain situations, where an OAC investigation does not necessarily result in an intentional act of fraud, but PHA has still been financially harmed, OAC will seek to enter into a Repayment Agreement with the resident/tenant to make PHA whole.

As of March 31, 2016, OAC has entered into Repayment Agreements to recapture a total of **\$801,442** of uncovered financial loss. In addition, of the financial losses uncovered, OAC has collected **\$349,181** as part of the Repayment initiative for the fiscal year ending 2016.

These numbers continue to grow and OAC seeks new avenues to recoup fraud, waste, and abuse at PHA.

## TERMINATION SAVINGS

As of March 31, 2016, OAC investigations of reported employee misconduct involving fraud, waste, and/or abuse resulted in the termination, resignation or demotion of 10 PHA employees, saving PHA **\$1,295,894** based on two-year salary projections. In addition, it is estimated that these terminations or resignations have resulted in a savings of pension contributions by PHA in excess of **\$359,177**.<sup>1</sup>



<sup>1</sup> OAC utilized conservative estimates in the determination of the financial impact of terminations, resignations, and demotions of PHA employees. Some agencies, particularly in the federal sector, project similar saving over the remainder of the dismissed employees' careers.

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## PARTNERSHIPS

The Office of Audit and Compliance has initiated and maintained partnerships with several federal, state, and local agencies in efforts to protect the integrity of PHA and to further hold individuals who defraud the Agency accountable. These partnerships include:

- Philadelphia District Attorney's Office
- U.S. Department of Housing and Urban Development (HUD)  
- Office of the Inspector General
- Social Security Administration - Office of Inspector General
- Federal Bureau of Investigation
- United States Postal Inspectors
- Internal Revenue Service
- United States Attorney's Office
- Pennsylvania State's Ethics Commission
- U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives
- Philadelphia Police Department
- U.S. Department of Homeland Security
- Pennsylvania Office of the Inspector General
- Philadelphia Office of the Inspector General
- Pennsylvania Department of Public Welfare
- Pennsylvania Department of Labor
- Pennsylvania State Police



## COMPLAINT INTAKE

As of March 31, 2015, the OAC Investigations Department received a total of 753 complaints. Of those complaints, 404 were opened as active investigations, 241<sup>2</sup> cases were substantiated, 32 of which were referred for criminal prosecution with 18 arrests completed.

As of March 31, 2016, the OAC Investigations Department received a total of 703 complaints. Of those complaints, 426 were opened as active investigations, 236<sup>3</sup> cases were substantiated, 26 of which were referred for criminal prosecution with 24 arrests completed.

## INTERNAL AUDITS

During Fiscal Years 2015 & 2016, Internal Audits (IA) completed 24 of 24 planned audits, as outlined in the fiscal years 2015 & 2016 annual Audit Plans. Two of the 24 audits had 23 different components, and involved interactions with 23 different audit clients. Additionally, IA completed one special project (review) as requested by PHA's management, and one continuous auditing initiative.

IA issued applicable draft audit reports and 23 review memorandums with associated Management Corrective Action Plans. In total, over the two year period, IA made more than 300 recommendations aimed at improving efficiency, economy, and operational effectiveness. Additionally, during Fiscal Year 2015, IA successfully closed 11 of 12 audits that were initiated in Fiscal Year 2014. The audit closure process entails IA performing extensive follow-up activities and working with various PHA departments, affiliates and Resident Councils to ensure that the agreed upon corrective action plan is implemented.

IA adopted five special projects during fiscal year 2016; these projects were extra initiatives that IA implemented with the goal of continuing to build relationships with our audit clients and to ultimately add value to PHA's operations.

In addition to identifying quantifiable measurable benefits, in terms of monetary recoveries and savings, OAC's audits identified other opportunities for improvement within PHA's operations. IA recommended the development and implementation of policies and procedures to several PHA's departments and programs with the goal of achieving consistency and standardization in day-to-day operational processes. Furthermore, IA collaborated with PHA's talented workforce to improve and implement effective internal control systems throughout the agency. The audits and reviews conducted resulted in more than \$900,000 in cost savings through direct implementation of recommendations, realized savings from the adoption of other recommended improvement opportunities, and potential recovery of federal funds.

<sup>2</sup> OAC Investigators have up to 180 days to complete an investigation.

<sup>3</sup> See footnote 2



# IDENTIFYING AND PREVENTING CORRUPTION

The Investigations Department is tasked with investigating allegations of fraud, corruption, official misconduct, conflicts of interest, abuse of authority and other criminal offenses with respect to employees, residents and persons or entities doing business with the Philadelphia Housing Authority. Over the last two fiscal years, OAC has focused on investigating complaints that target individuals who defrauded the Authority for personal gain.

For fiscal year 2015-2016, the Investigations Department received 1456 complaints and opened 830 cases which uncovered fraud in the amount of **\$5,081,108**. The following highlights some of the investigations completed by OAC during the reporting period.

## EMPLOYEE MISCONDUCT

OAC received a confidential complaint that a PHA employee was operating their own business during the work day while getting paid by PHA. The investigation uncovered that this employee was conducting personal business during work hours and used their PHA computer to operate this business. Additionally the investigation determined that the employee actually created false court documents signed by fictitious attorneys to further perpetuate their fraudulent scheme. When questioned about the matter, the individual denied the allegations despite being shown the voluminous evidence that was recovered from their PHA computer. Finally, a review of the employee's personnel records failed to uncover any evidence that the employee ever reported the existence of the additional business, which is in violation of PHA policies and procedures.

The results of the investigation were referred to the PHA Human Resources Department and, due to the seriousness of the violations, the employee was terminated.

## ALTERING DOCUMENTS

OAC received information that a PHA employee involved in performing tenant recertification for housing altered various documents in order to make it appear that the employee had completed the assigned work timely. A thorough review of a tenant folder under the employee's case load revealed that there were several documents that had been back-dated in order to bring the tenant file into compliance.

When the documents in question were presented to the PHA employee, the employee admitted that she had, in fact, altered them to look as if they were presented to PHA in a timely manner as required.

The results of the investigation were forwarded to the Human Resources Department, and the employee was terminated.

## UNREPORTED INCOME/UNAUTHORIZED TENANTS

Over the course of the past two fiscal years, OAC has investigated hundreds of individuals who allegedly misrepresented their family compositions or their household income in order to defraud PHA, and subsequently deny housing subsidy to those most in need. What follows are highlights of just a few of the number of substantiated investigations completed during the reporting period.



During the course of one investigation, it was determined that a PHA tenant failed to report over \$90,000 in income over a two year period. During an October 2012 recertification, this tenant signed verification that they only received \$2,976 annually in public assistance from the Department of Public Welfare, when in fact they were employed and earned \$97,117 from March 2012 through September 2014. Due to this tenant's failure to accurately report their earnings, it was calculated that PHA was defrauded out of \$14,108 over the two year period. In addition to losing their housing benefit, a referral was also made to the District Attorney's Office for the filing of criminal charges.

In another complaint, OAC received information that an HCV tenant allowed unauthorized individuals with income to reside in their HCV unit. An investigation ensued, which uncovered that not only was the tenant lying about who was living in the unit, but that the tenant themselves did not reside in the subsidized unit. In addition, one family member, who claimed to have no income, was actually employed with earnings in excess of \$33,000, which was never reported to PHA.

Furthermore, the two unauthorized residents who were actually living in the unit received over \$17,000 a year in income, which was also not reported to PHA. Finally, it was determined that yet another family member was receiving over \$8,500 a year income. OAC's investigations revealed that PHA overpaid by \$45,045 in monthly housing assistance payments to which the family was not entitled. Due to this

investigation, the tenant lost their Housing Choice voucher and was served with an arrest warrant for stealing tax-payer funds.

Fraud also occurs in units managed by Philadelphia Asset Property Management Corporation (PAPMC), an affiliate of PHA. In one case, a PAPMC tenant not only failed to accurately report their income, but also altered her paystubs to reflect less in income and actually misappropriated her deceased mother's social security number to accomplish her fraud. In a joint investigation between the OAC and the Social Security Administration Office of the Inspector General, it was uncovered that the PAPMC tenant provided PHA with her deceased mother's social security number to receive housing benefits. She also provided altered paystubs to reflect nominal income. At the same time, the tenant was actually receiving welfare benefits and working under her real social security number. When confronted with the overwhelming evidence of her fraud, the tenant admitted to her scheme. Based on the accurate information, it was found that this tenant benefitted from over \$28,000 in housing subsidy to which she was not entitled. The tenant in question was subsequently evicted from her PAPMC unit and her case was referred to the District Attorney's Office for the filing of criminal charges.

## VENDOR FRAUD

PHA employees also work diligently to ensure that those who are doing business with PHA are behaving honestly in their business dealings. OAC received information from PHA

employees that called into question the business practices of one of PHA's contracted vendors who had been procured to perform pest control services. The contract, which was for an initial period of two years with three optional one year renewals, was for a total amount of \$744,420 per year. Partially into the second renewal period, a PHA employee began to suspect that the vendor was not providing services as required pursuant to the contract between PHA and the vendor in question.

During the course of the investigation, OAC performed an extensive audit on the invoices submitted by the vendor. Based on this review, it was uncovered that the vendor was not providing complete services pursuant to the terms of the contract. In addition, in some instances, there was evidence that the vendor was charging PHA for services that were unnecessary or not according to the terms of the contract.

Based on the findings of the investigation, the contract with the vendor was terminated. As a result of this termination, PHA refrained from spending an additional \$1,800,000 to a vendor that was providing questionable services. In addition, PHA is now performing a large amount of pest control services in-house, thereby realizing additional savings to PHA.





# EXTERNAL PARTNERSHIPS

## OAC AND PHILADELPHIA DISTRICT ATTORNEY'S OFFICE PARTNER TO FIGHT FRAUD

OAC and the Philadelphia District Attorney's Office continue to partner together to hold those who defraud PHA accountable.

Over the 2015 fiscal year, OAC has made 18 arrests of people who failed to accurately report their earnings or those living with them who had income. Combined, the 18 former PHA participants defrauded PHA of over \$321,000.

During the 2016 fiscal year, 26 cases were referred for prosecution and all were subsequently approved for the filing of criminal charges. Combined, the 26 former PHA participants defrauded PHA of \$887,552.

The partnership between PHA and the Philadelphia District Attorney's Office remains strong and serves as a powerful message of their on-going commitment to hold those accountable who steal public funds.

## DEPARTMENT OF PUBLIC HEALTH PARTNER TO REDUCE RISK OF LEAD POISONING

OAC and the Philadelphia Department of Public Health (PDPH) strengthened their relationship over the 2016 fiscal year by updating the existing process for lead paint hazard control across PHA's housing programs. An updated Memorandum of Understanding (MOU) between PHA and PDPH was drafted to document the key responsibilities of each party entering into the MOU, with the ultimate goal of sharing a commitment to reduce risk of lead based paint poisoning in children within the Housing Choice Voucher and the Public Housing Programs.



# PROTECTING PHA'S ASSETS

## PHA ASSETS

The Internal Audit Department assists the Philadelphia Housing Authority's management and the Board of Commissioners through the Audit Committee by determining the effectiveness of PHA's internal control systems. IA's annual agency-wide risk assessment process produces an audit plan that prioritizes audits based on identified risks. By conducting risk-based audits and reviews, IA provides reasonable assurance regarding PHA's:

- Compliance with laws, regulations, policies, and procedures;
- Achievement of business objectives;
- Reliability of financial and management reporting; and
- Safeguarding of assets.



IA's Fiscal Year 2015 Internal Audit Plan consisted of Internal Audits or Reviews in the following areas:

1. Housing Choice Voucher Program Recertifications
2. Housing Choice Voucher Program Special Programs
3. 13 Resident Councils
4. Community Operations and Resident Development
5. Fixed Assets
6. Resource Allocation and Shared Services Agreement
7. Legal Services
8. Contract Procurement
9. Contract Administration
10. Events Management
11. Fleet Services
12. Overtime
13. Petty Cash
14. Tax Credit Sites Review

IA's Fiscal Year 2016 Internal Audit Plan consisted of Internal Audits or Reviews in the following areas:

1. Youth Programs
2. Data Backup & Security
3. Financial & Budgeting
4. Forfeiture Funds
5. Governance
6. HCVP Landlords
7. Inventory Auction & Scrap Sales
8. Lease Enforcement
9. Maintenance Materials, Time & Labor
10. 10 Resident Councils
11. Resident Services Training and Development Program
12. Treasury

Draft Internal Audit reports document any findings and recommendations determined as a result of the audit or review. Additionally, the reports document management's response and any corrective action plan items to address recommendations outlined within the reports. The reports are circulated to the audit client, PHA's President & CEO, as well as PHA's Audit Committee.

In Fiscal Year 2015 & 2016, the Internal Audit Department's audit reviews resulted in an actual recovery and savings of **\$91,539**. IA also identified additional **\$853,228** in potential recovery and savings.

## EVALUATING AND IMPROVING

The Compliance Department within OAC works closely with internal departments throughout PHA to ensure efficiency and effectiveness within the Agency's operations, programs, and services. Over the past fiscal year, these partnerships have led to the development and implementation of initiatives that have cut costs and increased productivity throughout the Authority, resulting in dollars saved, resources spared, and man-hours conserved. Complimentary to the Internal Audit Department, the Compliance Department assists with eliminating waste and achieving compliance with applicable rules, regulations, policies and procedures.

The Compliance Department's projects for the reporting period included:

### MAINTENANCE DEPARTMENT SITE BASED QUALITY ASSURANCE REVIEW (SBQAR)

The Compliance Department developed and conducted a review to capture and identify areas of concern and potential areas for improvement within PHA's robust Maintenance Department. The Compliance Department developed the SBQAR to ensure that the Maintenance Department is complying with the policies and procedures set forth by the Philadelphia Housing Authority in the Operations Desk Manual, Moving to Work Plan, and other applicable internal policies and procedures.

The Compliance Department partnered with the Maintenance Department to successfully create and implement a Corrective Action Plan to resolve the findings and improve process performance. As a result of this review, process improvements realizing savings in time, materials, and funding, were made in the following areas:

- Uniform Physical Condition Standards (UPCS) Inspections and Preventative Maintenance Inspections (PMI)
- Service Order Audits
- Service Orders
- Trip Sheets
- Material Storage
- Key Performance Indicator (KPI) Monitoring – Service Orders and Unit Turnover
- Real Estate Assessment Center (REAC) Inspections

### ANNUAL PROPERTY MANAGEMENT SITE BASED QUALITY ASSURANCE REVIEW (SBQAR)

The Compliance Department conducted a compliance review of the Public Housing (PH) Program to determine adherence to applicable policies and procedures. The Compliance Department uses the SBQAR process to routinely review site management office compliance with regulations set forth by the U.S. Department of Housing and Urban Development.



The 2015 fiscal year SBQAR covered 44 PH developments and included file reviews, office visual inspections, and Property Manager Interviews. In this review, a total of 483 files were reviewed and 10 Property Managers were interviewed.

The SBQAR accomplished the following:

- Provided an understanding of the relevant issues and concerns that exist within Housing Operations,
- Determined whether each site is adhering to mandated policies and procedures,
- Performed a rental integrity monitoring review of the tenant files,
- Reduced the number of errors in rent calculations in order to reduce improper subsidy payments, and
- Ensured the housekeeping files are properly recorded and filed.

## CHARGEBACKS

At the close of FY 2014, OAC in conjunction with the Maintenance and Housing Operations Departments, implemented improvements in procedures, system functionality, and conducted training on charging residents for tenant caused damage. In Fiscal Year 2015, PHA and PAPMC charged a total of \$111,383 in Chargebacks, which represented an increase of over 600 percent of the original \$18,109 that was charged before the project began.

## HOUSING CHOICE VOUCHER PROGRAM (HCVP) QUALITY CONTROL HOUSING QUALITY STANDARD (HQS) UNIT INSPECTIONS

The Compliance Department conducts monthly inspections to monitor the performance of the HCVP inspectors and make recommendations based on HQS deficiencies. During the fiscal year of 2015 a total of 663 Quality Control HQS Unit Inspections were conducted and all identified violations were reported and corrected.

## PUBLIC HOUSING PROGRAM SERVICE ORDER AUDITS

The Compliance Department also conducts monthly service order audits. The service order audits are conducted by performing unit inspections as well as system reviews for completed Housekeeping Inspections (HK), Uniform Physical Condition Standards (UPCS) Inspections and work orders. The service order audits review the quality of work of the work orders, UPCS inspections, and HK inspections performed by Maintenance staff and Property Managers, which includes an assessment of the recorded time and materials charged to each service order. During the fiscal year of 2015 a total of 131 service order audits were conducted and all identified findings reported and corrected.

## U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT REVIEWS

HUD conducts ongoing monitoring reviews of the PHA. The Compliance Department, in conjunction with all of PHA's departments, ensured PHA's efficient and transparent cooperation with, and response to, the following HUD reviews over the 2015 & 2016 Fiscal Years:

1. HUD Review ARRA Competitive Grant Mantua and Paschall
2. HUD HCV Customer Service Review
3. HUD HCV Single Room Occupancy (SRO) Monitoring Review
4. HUD Maintenance Follow up Monitoring Review
5. HUD Oversight Review - PAPMC and AME
6. HUD Review of Mt. Olivet
7. HUD Public Housing Utilization Field Office On Site Technical Assistance Review

## STANDARD OPERATING PROCEDURES

The Compliance Department worked with the various PHA Departments and Programs to develop Standard Operating Procedures (SOPs) and additional oversight controls in an effort to improve compliance with applicable rules and regulations. Additionally, the Department assisted in the implementation of metrics and tools to further assist Departments in tracking performance. In the Fiscal Year 2016, the Compliance Department drafted and/or updated SOPs in the following functional areas:

1. Pest Management Control
2. Tenant Bad Debt Reporting
3. Uniform Physical Condition Standard Inspections (UPCS)
4. Vendor Debarment Checks
5. Emergency Procurement Validation

## AUDIT FOLLOW UP

In FY2015, the Compliance Department of OAC conducted a series of follow-up reviews to audits of PHA's departments and programs including: Section 3 program; HCV Program Waitlist Management; HCV Rent Reasonableness, and; Risk Management. The follow-up reviews were conducted to assess the state of compliance for the recommended findings that resulted from the Internal Audit Reports and Corrective Action Plans (CAPs). Findings, Areas of Concern, Recommendations, and Required Actions listed in the final Audit Reports were reviewed against the CAPs. The Compliance Department worked with the departments and programs to develop tracking and monitoring mechanisms, SOPs and additional oversight controls, in an effort to improve overall compliance with all applicable requirements and further PHA's goal of opening doors to opportunities.

# WAGE COMPLIANCE

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The Wage Compliance Unit monitors the wages of employees working on PHA construction and maintenance projects to ensure that, when applicable, the correct prevailing wage is paid for the work performed. Fiscal year 2015 resulted in the issuance of **\$25,021** in citations to various vendors. Wage Compliance enforcement for fiscal year 2016 resulted in issued citations and/or back wage payments totaling **\$96,880**. A couple of examples of violations determined by OAC are listed below.

## LANDSCAPING AND UNIT CLEAN-OUTS

OAC's review determined that multiple PHA contractors failed to pay the required prevailing maintenance wage rates to laborers and mechanics performing landscaping and clean-out work on PHA properties, resulting in numerous violations of the U.S. Housing Act of 1937 and its prevailing wage requirements for maintenance projects. Due to these violations, the contractors were required to pay additional wages in the amount of **\$20,400** in back wages to the affected employees.

## OAKDALE STREET PROJECT

OAC's review determined that a subcontractor performing work for a PHA general contractor failed to comply with prevailing wage requirements by failing to pay the required fringe benefits to employees performing work on the project. OAC determined that laborers and mechanics working on the project were underpaid a total of **\$19,580** for the time period from September 2014 through October 2014, and **\$81,831** for the time period from January 2015 through April 2015; the contractor was ordered to pay back wages to the affected employees.

# MOVING FORWARD

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## The Office of Audit and Compliance's Vision and Values will continue to be as follows:

- Conduct quality audits of PHA's operations in a timely and efficient manner and in accordance with professional standards established by the Institute of Internal Auditors and Generally Accepted Government Auditing Standards
- Conduct investigations in a timely, thorough, and impartial manner
- Ensure transparency and accountability in PHA operations, services, and programs
- Work closely with other law enforcement, state, and federal agencies to detect and investigate corruption, fraud, waste, abuse, mismanagement, and conflicts of interest
- Ensure the integrity in PHA's financial reports
- Ensure the optimal efficiency and effectiveness in PHA's operations, programs, and services by emphasizing ongoing compliance with all applicable rules and regulations

To confidentially report PHA-related fraud, corruption, employee misconduct, conflicts of interest, waste, or mismanagement to the Office of Audit and Compliance:

- Call PHA's Fraud Hotline: **215.684.8300**
- Email: **OAC@pha.phila.gov**
- Send mail to: **Office of Audit and Compliance**  
**12 South 23rd St, 5th Floor, Philadelphia, PA 19103**



