



**U.S. Department of Housing and Urban Development**  
Houston Field Office, Region VI  
Office of Public Housing  
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www.hud.gov

July 6, 2009

Mr. Guy Rankin  
Chief Executive Officer /Executive Director  
Harris County Housing Authority  
8933 Interchange  
Houston, TX 77054

Dear Mr. Rankin:

**SUBJECT: Consolidated Tier I On-site Review Report**

In accordance with HUD regulations, staff of the Houston Office of Public Housing completed a Tier I review of the Harris County Housing Authority. The review was conducted during the week of June 16, 2009 through June 19, 2009.

The purpose of the Consolidated Tier I Review was to assist the Office of Public and Indian Housing's (PIH) effort to ensure comprehensive monitoring and oversight of PHAs.

The Consolidated Tier I Review consisted of the following components: Rental Integrity Monitoring (RIM); Upfront Income Verification (UIV) Monitoring; and Section Eight Management Assessment Program (SEMAP) Quality Control. This office also conducted a limited Management review which looked at aspects of the Section 8 Housing Choice Voucher program including, but not limited to: Governance; Organization and Staffing; Finance; Internal Controls; Civil Rights-Related Program Requirements (CRRPR); Section 504; and Quality Assurance to assess the Housing Authorities compliance with federal regulations and local policies. A brief description of each review follows:

#### RIM Review

The purpose of the RIM review was to establish whether and to what extent PHAs are accurately, thoroughly and clearly determining family income and rent in the Section Eight Housing Choice Voucher program. The primary objectives of RIM reviews are:

- a. Detect and reduce errors in income and rent calculations
- b. Reduce rent underpayments and/or overpayments by residents

### UIV Implementation

Tier I reviews must include a review of PHAs' UIV implementation. The purpose of the UIV review was to ensure that the HCHA has:

- a. Implemented the use of HUD-provided UIV systems (Enterprise Income Verification (EIV)) adequate security measures to protect electronic data along with tenant file program compliance.
- b. Documented practices, controls and safeguards to adequately protect the confidentiality of participant income data.
- c. Taken the appropriate corrective action to eliminate subsidy payment errors and tenant errors attributable to income discrepancies by HUD-provided UIV systems.

### SEMAP Quality Control Review

We are required to conduct SEMAP Confirmatory reviews of Tier I PHAs pursuant to guidance in PIH Notice 2005-33. We must select a random sample of the PHA's supporting QC file documentation for SEMAP indicators: 1 (Selection from the Waiting List); 2 (Rent Reasonableness); 3 (Adjusted Income); 5 (HQS Quality Control Inspections); and 6 (HQS Enforcement).

### Section 8 Housing Choice Voucher Program Administration and CRRPR / Section 504

The following areas were reviewed for compliance:

- Administration Plan
- Fair Market Rent Schedule
- Income Limits
- Voucher Payment Standards
- Utility Allowance Schedule
- Briefing Packet
- Waiting List
- Housing Assistance Payment Register
- Public Housing Information Center (PIC) Data
- Reasonable Accommodation Protocol

A closeout conference was held with Mr. Guy Rankin, Chief Executive Officer and key staff. The review team had no findings or observations. A finding is a violation of Federal Regulations, Annual Contributions Contract requirements and/or HUD directives, and therefore, the HA must enact the specific corrective actions noted in this report. An observation is an action that warrants attention and is followed by a recommended corrective action. All concerns were fully discussed on-site and if applicable, immediately addressed. As noted, after the Office of Fair Housing and Equal Opportunity (FHEO) has reviewed all data, if civil rights and fair housing issues arise they will work directly with HCHA to resolve the problems.

This Review Report is detailed in the following format:

Section 1 – General  
Section 2 – RIM  
Section 3 – SEMAP  
Section 4 - UIV  
Section 5 – FHEO

We hope that you will discuss this report in detail and use it as a technical assistance management tool for improving the overall management performance of the HCHA. *Information in this report may be of personal and confidential nature; therefore, this report should be shared only in the course of official business.*

We wish to express our sincere appreciation to the HCHA staff for the courtesy extended and cooperation provided during the review. Please contact the review Team Leader, Mrs. Lorraine Walls at (713) 718-3214, if you have any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Rodriguez, Jr.', with a long, sweeping horizontal stroke extending to the right.

Daniel Rodriguez, Jr.  
Director  
Office of Public Housing

Enclosure

cc:  
Board Chair  
FHEO Houston Field Office

DEPARTMENT OF HOUSING & URBAN DEVELOPMENT  

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Houston Office of Public Housing



Consolidated Review  
Harris County  
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Reports

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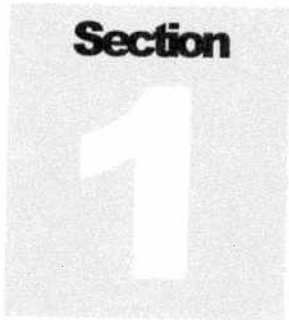
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## **GENERAL OVERVIEW**



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### **GOVERNANCE**

#### **Bylaws**

The Harris County Housing Authority's (HCHA) Bylaws were approved on October 20, 2004. According to the Bylaws the fiscal year of the housing authority is April 1 to March 31. The annual meeting of the Board shall be held between March 1 and March 15 of each year or on such date as may be determined by the Board. Regular meetings are held monthly with notice and the appropriate postings.

#### **Board Approved Resolutions**

The Board is in compliance with the Open Meetings Act. Regularly scheduled meetings are held every month and notices are posted. Board minutes are recorded and filed in folders by year along with any resolutions approved during the meeting.

#### **Terms of Commissioners**

The Board of Commissioners consists of five (5) members; the length of service varies from four (4) years to four (4) months. The following individuals currently serve on the Board:

<b><u>Board Member</u></b>	<b><u>Tenure</u></b>	<b><u>Appointed</u></b>	<b><u>Expires</u></b>
Walter Jones	2 years	February 28, 2009	February 28, 2011
Casey Wallace (*)	4 years	April 4, 2006	April 4, 2010
Peggy Kruckemeyer	2 years	August 5, 2008	August 31, 2010

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HCHA CONSOLIDATED REVIEW REPORT- GENERAL**

Graciela Martinez	4 years	December 23, 2008	February 28, 2011
Gilbert Herrera	2 years	June 21, 2007	February 28, 2009

\*= Chairman

The Board fully understands its roles and responsibilities in the operation of the Authority. They allow the Executive Director (ED) to run the day-to-day operations of the Authority. The Board of Commissioners and the ED have ensured that the Housing Authority submits its program reports to HUD in a timely manner and completes its reporting submissions in accordance with applicable regulations; for instance, PHA Plan and SEMAP Certifications.

We did note that the term of Mr. Gilbert Herrera expired February 28, 2009. According to protocol, the Harris County Commissioners Court will appoint a new commissioner or re-appoint this commissioner within ninety (90) days of the end of the term. Overall, the position should be filled in the immediate future.

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**ORGANIZATION  
& STAFFING**

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Mr. Guy Rankin is the Chief Executive Officer and Executive Director of the Harris County Housing Authority (HCHA). Mr. David Gunter is the Chief Administrative Officer. Mr. Graylin Guidry is the Chief Financial Officer and Ms. Melisa Quijano the Director of the Housing Choice Voucher Program. Ms. Anna Hinojosa is the Assistant Director of the Housing Choice Voucher Program. The Development Director is Ms. Paula Sullivan. The HCHA has fourteen (14) housing counselors and/or specialist supported by three inspectors.

**Training**

The HCHA has a robust staff training program utilizing a national training organization with an on-site trainer. Staff knowledge, skills and abilities are continuously updated and supportive services are readily available. Thirty-six training certifications were provided representing the latest certifications for staff.

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**HOUSING  
MANAGEMENT**

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It was noted during the course of the review that the Housing Authority is well managed. HCHA's HCVP management team is composed of: Ms. Melissa Quijano; Ms. Anna Hinojosa; and Mr. David Gunter. According to our records they are responsive and readily available to handle inquiries and trouble shoot situations as they arise. Each has volunteered to assist their peers and frequently requested to share their exemplary protocols and/or provide technical assistance throughout the area. They are well respected amongst their peers and the Department.

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Overall, HCHA HCVP staff is knowledgeable in the day-to-day operations of the Housing Authority. Performance evaluations are completed annually. Staff has access to self-improvement tools and their practices are some of the best throughout our region.



Lobby

**Admissions**



Waiting Area

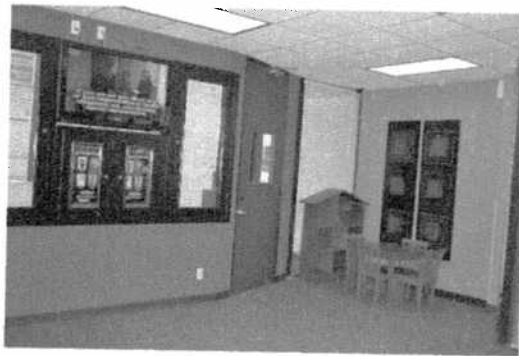
The HCHA's Administrative Plan was determined to have policies that adequately address key aspects of verification information related to income and rent determinations. After interviewing staff and reviewing the waiting list, the Housing Authority appears to be following their selection criteria. Briefing packets for the HCVP were found to be exemplary and we appreciated the booklet as a model for your peers. After the review, the latest roster of housing throughout the Houston area to include in your packet was forwarded electronically.

The HCHA has an exemplary intake system and lobby with semi-private booths and an electronic bulletin board.

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HCHA CONSOLIDATED REVIEW REPORT- GENERAL**



Intake Area



Electronic Bulletin Board & Children's Corner

**Security General and Files**



File Room

The HCHA has an on-site security officer and good relationship with local law enforcement. The office entries and files are secured in accordance with HUD guidelines. The file control room is an example for HUD Region VI. The file room is well staffed with a window for services only authorized personnel are permitted access. The HCHA proficiently utilizes an electronic application called Smeadlink to electronically track files.

### IPA Audit for FY 2008

We reviewed HCHA's IPA Audit for FY 2008. The HCHA's IPA Audit did not contain any findings for the years March 31, 2007 and March 31, 2008.

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#### COMMENTS

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1. The HCHA may want to expand and/or enhance Enterprise Income Verification (EIV) investigations.
2. HCHA should continue to review monthly the Key Management Indicator's Report and track each applicable category. At this time, the over housed activity should be evaluated and action taken, where applicable.
3. As stated in the January 2009 revised Voucher Management System(VMS) User's Manual, Release 4.7.1.0, it is imperative that PHAs comply with reporting requirements and timelines for reporting through VMS, ensuring that the information submitted is both timely and accurate. The HCHA should diligently monitor VMS submissions so that accurate reporting rates are maintained.

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#### HONORABLE MENTIONS

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1. It is worthy to note as a best practice quality control protocol is the HCHA's utilization of the Department's Rental Integrity Monitoring (RIM) Guide Appendix C checklist. We believe this was the "secret" to HCHA's successful RIM program practice of continuous monitoring with spontaneous corrective action(s) and/or updated protocols.
2. We noted during a tour of the facility that each housing counselor's station had guidebooks readily accessible and uniformly labeled. This practice enhances their productivity and insures information is not only convenient but utilized and personalized for each counselor's workload.



Staff Cubicle

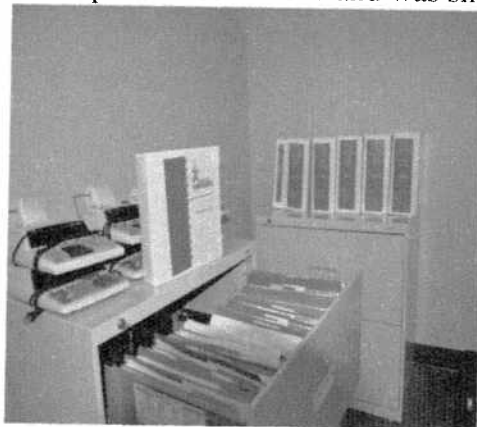
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3. The HCHA has a commendable continuous training program with on-site trainers from a national training firm. Certificates of training and a course schedule were provided along with a sample briefing book.
4. It was noted that the HCHA's lobby is "state of the art" the comfortable waiting area has semi-private interview stations and a children's corner. This type of well appointed amicable reception to clients enhances the exchange of documents and fosters goodwill.

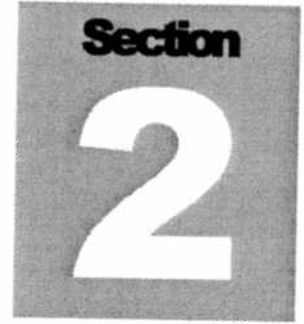


Interview Cubicle

5. The HCHA's utilizes a combination electronic and paper bulletin board for clients in their waiting area. The board continuously plays briefing information for customers while they wait. We believe this is an excellent time management tool that minimizes questions while maximizing the efficiency of clients in presenting completed packages.
6. We thank the HCHA for their hospitality and record keeping presentation. Ms. Melissa Quijano, Ms. Anna Hinojosa and Mr. David Gunter competently and amicably responded to the reviewer's inquiries and/or provided supporting documentation, upon request. It truly expedited the review and was sincerely appreciated.



Review Records and Files



# **Rental Integrity Monitoring (RIM) Review Report**

*The purpose of a RIM review is to assess whether and to what extent a public housing agency (PHA) is accurately, thoroughly and clearly determining family income and rent in the Public Housing and /or Section 8 Housing Choice Voucher (HCV) programs in compliance with statutory, regulatory and HUD administrative requirements.*

RIM reviews are one strategy in a larger, HUD-wide initiative designed to reduce income and rent errors in the administration of federally assisted housing programs – known as the Rental Housing Integrity Improvement Project (RHIIP). RHIIP supports the Presidential mandate that requires federal agencies to reduce costly program errors. The purpose of a RIM review is to assess whether and to what extent a public housing agency (PHA) is accurately, thoroughly and clearly determining family income and rent in the Public Housing and /or Section 8 Housing Choice Voucher (HCV) programs in compliance with statutory, regulatory and HUD administrative requirements. In addition to identifying and correcting existing errors in income and rent determinations, RIM reviews afford HUD the opportunity to provide guidance and technical assistance to PHAs on strengthening income and rent policies/procedures and reducing future errors.

This report outlines the results of a Rental Integrity Monitoring (RIM) review conducted during the period of June 17 through 20, 2009 for the Housing Choice Voucher Program administered by the Harris County Housing Authority (HCHA).

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HCHA CONSOLIDATED RIM REVIEW REPORT**

The review was comprised of two major areas: income and rent discrepancies, and policy and procedure issues. These areas were audited via tenant file documentation reviews and RIM guide protocols.

A file sample consisting of 28 files were reviewed to determine systemic errors. This sample was provided by through a random selection of HCHA program participants. A data collection form (RIM Appendix A) was prepared for each file reviewed; comparing the PHA reported data on the most recent 50058 transaction, against the documentation found in the file by the HUD reviewer. Of the 28 files reviewed, 1 was found to contain one or more errors, resulting in an error rate of 3.57 %.

### **Synopsis of Reviewer Comments**

1. The files were well organized, documented and maintained. HUD staff found it easy to do a file review. The review team liked how the files were divided with tabs for each certification and robust comments.
2. We noted that part of the HCHA's quality control protocol is to utilize the same RIM forms that the Department uses. This was an excellent practice and we commend the HCHA for their proactive utilization and comprehensive quality control measures. The team did provide an updated version of the form during close-out for future reference.
3. The HCHA's staff was proactive in responding and providing clarifications on tenant files and/or documents. This enabled any areas of concern to be rectified during the review resulting in no findings or observations.

### **Follow-Up**

On July 1, 2009, the HCHA submitted sufficient documentation concerning file 9628 therefore no further action is required and the review has been closed.

### **Conclusion**

Our review determined that the HCHA's files were well organized and easy to audit *No systemic errors noted.* The HCHA prepared a binder of their rental integrity protocols that was cross checked with HUD RIM policies and procedures. It was confirmed that the HCHA's procedural process ensures a high level of accurate income and rent determination. The success of the program is HCHA's exemplary quality control system coupled with a continuous training program. *We wish to express our sincere appreciation to the HCHA staff for the courtesy extended and cooperation provided during the review.*

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**CONFIDENTIALITY STATEMENT**

Information in this report may be of personal and confidential nature; therefore, this report should be shared only in the course of official business.

**TENANT FILE ERROR REPORT**

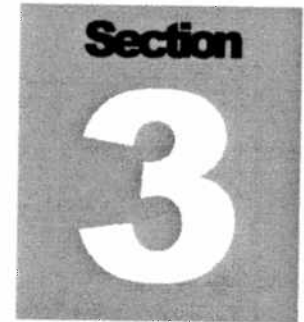
<b>Tenant ID</b>	<b>File Errors</b>	<b>Corrective Actions</b>
8677	NO ERRORS	
4840	NO ERRORS	
1878	NO ERRORS	
9390	NO ERRORS	
8142	NO ERRORS	
6837	NO ERRORS	
7272	NO ERRORS	
5790	NO ERRORS	
8734	NO ERRORS	
5811	NO ERRORS	
6842	NO ERRORS	
9628	Code 206: Other	Provided updated HUD Form 50058 & HAP Register on 7/1/09
1207	NO ERRORS	
2152	NO ERRORS	
0607	NO ERRORS	
5718	NO ERRORS	
4126	NO ERRORS	
6187	NO ERRORS	

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HCHA CONSOLIDATED RIM REVIEW REPORT

**TENANT FILE ERROR REPORT CONTINUED**

<b>Tenant ID</b>	<b>File Errors</b>	<b>Corrective Actions</b>
3898	NO ERRORS	
7982	NO ERRORS	
4247	NO ERRORS	
7892	NO ERRORS	
5014	NO ERRORS	
3730	NO ERRORS	
2599	NO ERRORS	
5462	NO ERRORS	
9479	NO ERRORS	
7468	NO ERRORS	

END OF RIM REVIEW REPORT



# **Section Eight Management Assessment Program (SEMAP) Quality Control Review Report**

*SEMAP enables HUD to better manage the Section 8 tenant-based program by identifying PHA capabilities and deficiencies related to the administration of the Section 8 program. As a result, HUD will be able to provide more effective program assistance to PHAs. A SEMAP Quality Control (QC) Review is to assess a targeted portion of the certification for program compliance with statutory, regulatory and HUD administrative requirements.*

The U. S. Department of Housing and Urban Development (HUD) is required to assess the performance of each Public Housing Authority (PHA) under the Section Eight Management Assessment Program (SEMAP) annually. HUD will assign a numerical SEMAP score and an overall performance rating of high performer, standard performer, or troubled.

The Houston Office of Public Housing is required to conduct SEMAP Confirmatory reviews of Tier I PHAs pursuant to guidance in PIH Notice 2005-33. We must select a random sample of the PHA's supporting QC file documentation for SEMAP indicators 1 (Selection from the Waiting List), 2 (Rent Reasonableness), 3 (Adjusted Income), 5 (HQS Quality Control Inspections) and 6 (HQS Enforcement).

This report outlines the results of a Section Eight Management Assessment Program (SEMAP) Quality Control (QC) review conducted during the period of June 17<sup>th</sup> through 20<sup>th</sup>, 2009 for the Housing Choice Voucher Program administered by the Harris County Housing Authority (HCHA).

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HCHA CONSOLIDATED SEMAP QC REVIEW REPORT**

The following areas were reviewed for compliance:

- Administration Plan
- Fair Market Rent Schedule
- Income Limits
- Voucher Payment Standards
- Utility Allowance Schedule
- Briefing Packet
- Waiting List
- Housing Assistance Payment Register
- Public Housing Information Center (PIC) Data

The Harris County Housing Authority (HCHA) according to the Voucher Management System (VMS) administered a Section 8 program of 2,142 Vouchers as of FY 2009. The HCHA successfully resubmitted an electronic SEMAP Certification for the Fiscal Year ended 3/31/2009, in which the final SEMAP score was 104 points of a possible 145 points, or 100% High Performer.

**I. SEMAP Quality Control Scoring**

SEMAP is designed to assess whether the PHA's Section 8 tenant-based assistance programs operate effectively and in accordance with program guidance. Under SEMAP, HUD measures PHA performance in 15 key Indicators. PHAs must self-certify as to their performance on these Indicators by submitting the annual SEMAP Certification. Information from HUD's Multi-Family Tenant Characteristics System (MTCS) database is used to score Indicators 9, 10, 12, and 14. The On-site SEMAP Quality Control Review consisted of Indicators 1, 2, 3, 5 and 6.

The table below shows the Indicator scores based on the SEMAP Certification submitted by HHA for 3/31/2009 and the confirmed score based on this review:

**HHA SEMAP Scores**

Indicator	Maximum Score	3/31/2009 SEMAP Certification	Confirmed Score
<b>1. Selection from the Waiting List (*)</b>	<b>15</b>	<b>15</b>	<b>15</b>
<b>2. Reasonable Rent (*)</b>	<b>20</b>	<b>20</b>	<b>20</b>
<b>3. Determination of Adjusted Income (*)</b>	<b>20</b>	<b>20</b>	<b>20</b>
4. Utility Allowance Schedule	5	5	
<b>5. HQS Quality Control Inspections (*)</b>	<b>5</b>	<b>5</b>	<b>5</b>

**HOUSTON OFFICE OF PUBLIC HOUSING  
HCHA CONSOLIDATED SEMAP QC REVIEW REPORT**

Indicator	Maximum Score	3/31/2009 SEMAP Certification	Confirmed Score
<b>6. HQS Enforcement (*)</b>	<b>10</b>	<b>10</b>	<b>10</b>
7. Expanding Housing Opportunities	5	5	
8. Payment Standards	5	5	
9. Annual Reexaminations	10	10	
10. Correct Tenant Rent Calculations	5	5	
11. Pre-contract HQS Inspections	5	5	
12. Annual HQS Inspections	10	10	
13. Lease Up	20	20	
14. Family Self-Sufficiency	N/A	N/A	
15. Deconcentration Bonus	5	5	
Total	145	104	104
Per cent	100%	100%	100 %

A discussion of each SEMAP Quality Control (+) Indicator is contained on the following pages.

***Indicator 1—Selection from the Waiting List***

This Indicator assesses whether the PHA has written policies in its administrative plan for selecting applicants from the waiting list and whether they follow these policies when selecting applicants for admission. The PHA's quality control samples must document that at

least 98% of applicants are correctly selected from the waiting list in order to score 15 points on this Indicator; less than 98% results in a score of 0 points. (Reference: 24 CFR 982.54(d) (1) and 982.204(a).

The HHA provided a quality control sample of applicants reaching the top of the waiting list in accordance with 24 CFR 985.2 in which an annual sample of files or records was drawn in an unbiased manner and reviewed by the PHA supervisor to determine if the work documented in the files or records conform to program requirements. The HHA has written policies in its Administrative Plan for selecting applicants from the waiting list. HHA was able to prove on an individual basis that each person in the sample drawn by the HUD reviewer was drawn in accordance with its Administrative Plan.

**The score for this Indicator will therefore remain the same at 15 points.**

***Indicator 2 – Rent Reasonableness***

This Indicator assesses whether the PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units: at the time of initial leasing; if there is any increase in the rent to owner; and at the HAP contract anniversary if there is a 5 percent decrease in the published fair market rent (FMR) in effect 60 days before the HAP contract anniversary. The PHA's method must take into consideration the location, size, type, quality and age of the units, the amenities, housing services, maintenance and utilities provided by the owners in determining the reasonable rent. The PHA's quality control sample must demonstrate that rent reasonableness is correctly applied at least 98% of the time to score the full 20 points for this Indicator. A rate of 80-97% will receive a score of 15 points; less than 80% will score 0 points. (Reference: 24 CFR 982.4, 24 CFR 982.54 (d) (15), 982.158(f)(7) and 982.507)

HCHA's SEMAP Certification states that they have implemented a written method to determine and document rent reasonableness for at least 98% of the units leased. The intent of rent reasonableness is to compare proposed Section 8 units to unsubsidized units currently or recently available. The HCHA was able to document that it drew an unbiased sample of files for FY 2009. Based on the random sampling of 32 file documents reviewed by HUD, all files contained the required comparability studies as stated in the HCHA's Administrative Plan.

The database was reviewed for determining Rent Reasonableness for compliance with HUD regulations. HCHA is in compliance. The staff responsible for rent reasonableness was interviewed and appeared to have knowledge of how rent reasonableness is determined in accordance with HHA's Administrative Plan. Our file review determined that the Authority was consistently placing the Rent Reasonable documentation in the files.

**The score for this Indicator will therefore remain the same at 20 points.**

***Indicator 3 – Determination of Adjusted Income***

This Indicator assesses whether, at the time of admission and annual reexamination, the PHA verifies and correctly determines adjusted annual income for each assisted family and, where the family is responsible for utilities under the lease, the PHA uses the appropriate utility allowances for the unit leased in determining the gross rent. The PHA's quality control sample must demonstrate that income is correctly calculated at least 90% of the time in order to score 20 points on this Indicator. A rate of 80-89% will score 15 points; less than 80% will score 0 points. (Reference: 24 CFR 5, Subpart F and 24 CFR 982.516)

HCHA's SEMAP Certification states that at least 90% of the files sampled in a quality control review showed that the HHA did correctly determine adjusted income. To confirm this Indicator we reviewed a sample of tenant files. Of the 32 file documents reviewed we were able to determine that the HHA verified and correctly calculated the adjusted annual income for each file.

The team reviewed a twenty-eight sample of files and found that the Housing Authority was completing the recertifications timely. Two Specialists were interviewed during the review. They each appeared to have a clear understanding of the processes and procedures for completing the reexaminations. The HCHA utilizes HUD Rental Integrity Monitoring (RIM) forms for quality control on their files and as a learning tool.

**The score for this Indicator will therefore remain the same at 20 points.**

***Indicator 5 – HQS Quality Control Inspections***

This indicator is required by 24 CFR 982.405(b). The HCHA has five staff members to accomplish HQS inspections as a primary function of their normal duties and three staff members to complete the quality control re-inspections. The inspectors complete the initial unit inspection. The quality assurance inspector reviews the performance of the primary inspectors and their inspection report forms. The Quality Control inspections performed represented a cross section of neighborhoods, owners, inspection types, and unit types. HCHA provided a sample of thirty-two quality control inspections along with all applicable supporting documentation.

The HCHA has the data and supporting documentation necessary for compliance with this Indicator as required by 24 CFR 982.405(b).

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HCHA CONSOLIDATED SEMAP QC REVIEW REPORT

The score for this Indicator will therefore remain the same at 5 points.

*Indicator 6- HQS Enforcement*

This Indicator seeks to establish that the housing authority exercises enforcement authority for failed unit inspections. The minimum criteria establishes a 24 hour time period for abatement or corrective action to eliminate any deficiency that is determined to be life threatening. Non-life threatening deficiencies have a 30-day time period for corrective action. However, the housing authority may grant approved time extensions for deficiencies. Furthermore, the housing authority must abate housing assistance beginning no later than the first month following the specified correction period.

The point award of 10 points is granted when compliance criteria is 98% or greater. The point award of 0 points is granted when compliance criteria is less 97% or less.

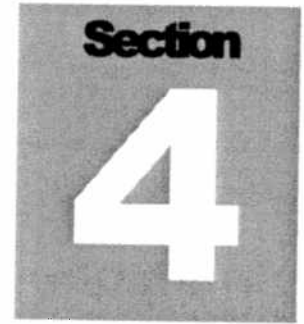
The HCHA provided satisfactory documentation supporting the certification for this indicator during the review. The HCHA ensures that deficiencies are corrected within 30 days or within the HCHA approved extension.

The score for this Indicator will therefore remain the same at 10 points.

**Conclusion**

*The review team confirmed that the HCHA will be designated a **High** performer for the Fiscal Year ended 3/31/09. We strongly recommend that HHA continue to practice their outstanding SEMAP quality control protocols and continuous training program.*

**END OF SEMAP QC REPORT**



***UPFRONT INCOME VERIFICATION  
MONITORING REPORT***

**U.S. Department of Housing and Urban Development (HUD)  
Upfront Income Verification (UIV) Monitoring Report**

**Purpose:** An Upfront Income Verification (UIV) onsite/remote review is required for any PHA that is subject to a Comprehensive Review in accordance with the Fiscal Year 2007 Management plan and has access to the Enterprise Income Verification (EIV) System.

The purpose of HUD's Upfront Income Verification (UIV) onsite/remote review is to ensure that the PHA has:

- 1) Implemented the use of the HUD-provided UIV tool (The Enterprise Income Verification (EIV) system);
- 2) Implemented and documented practices, controls and safeguards to adequately protect the confidentiality and security of participant income data; and
- 3) Taken the appropriate corrective action to eliminate subsidy payment errors and tenant errors attributable to tenant under reporting of income.

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**UIV Review Date: 06/16/2009**

**Reviewer Name: Antonio Mosqueda**

**Check this box if this is a follow-up review**

**Date of Previous Review: 06/21/05**

**PHA Code: TX441**

**PHA Name: Harris County Housing Authority**

**Program Type (Check one only):**  **Section 8**     **Public Housing**     **Combined Programs**

**PHA Contact Person: Mellissa Quijano**

**Telephone Number: (713) 669-4519**

**PHA Contact Person: Guy Rankin**

**Telephone Number: (713) 578-2045**

**A. PHA'S IMPLEMENTED UIV TOOLS**

1.  **Yes**     **No**    Does the PHA have access to HUD's EIV system?  
If yes, answer questions 2-4. If the answer is no, skip questions 2-3.
2.  **Yes**     **No**    According to the EIV PHA Access Usage Report, has the PHA used the EIV system within the last 30 days?
3.  **Yes**     **No**    According to the EIV PHA Access Usage Report, has the PHA used the EIV system within the last 180 days?
4.  **Yes**     **No**    Does the PHA use UIV tools that are not provided by HUD?  
If yes, please list the tools that the PHA has implemented.  
PHA utilizes the Work Number and also has a cooperative agreement with Texas Health & Human Services for the provision of data regarding TANF and Food Stamp assistance.

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**B. PHA SECURITY ASSESSMENT**

**Requirements:** Field Office staff should review the PHA's: 1) security policies and procedures; 2) EIV user administration reports; 3) security and system access files; and any other documents that will provide answers to the questions below. Field Office staff may also want to conduct an interview with the Executive Director, Security Officer, and/or other designated staff persons that have knowledge of the PHA's security procedures and policies and are able to respond to the questions below.

1.  **Yes**  **No** Does the PHA have a designated Security Officer or equivalent?
2.  **Yes**  **No** Does the PHA have a Security Policies and Procedures document?
3.  **Yes**  **No** Does the PHA enforce security procedures?
4.  **Yes**  **No** Does the PHA keep records and monitor security issues?
5.  **Yes**  **No** Does the PHA conduct and document Security Awareness Training for its employees?
6.  **Yes**  **No** Does the PHA ensure that each user has and uses his/her own user ID and password?
7.  **Yes**  **No** Does the PHA maintain copies of signed access authorization and rules of behavior/user agreement forms for each EIV system user?
8.  **Yes**  **No** Does the PHA maintain a key control log to track the inventory of keys available for secure rooms, buildings or file cabinets?
9.  **Yes**  **No** Does the PHA maintain a log of all destroyed UIV documents or have a record retention policy?
10.  **Yes**  **No** Does the PHA have a valid (dated within the last 15 months) HUD Form 9886 or equivalent consent form in the tenant file?
11.  **Yes**  **No** Does the PHA document the *occurrence* of all improper disclosures of UIV information in writing or have a procedure to document improper disclosures?
12.  **Yes**  **No** Does the PHA report any *occurrence* of unauthorized access or known security breaches to the designated PHA/HUD staff person(s) or have a procedure to report an *occurrence* of unauthorized access or known security breaches to the designated PHA/HUD staff person(s)?

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13.  Yes  No Does the PHA use any of the below security methods to provide physical security of UIV data? If yes, check all security methods the PHA uses.
- Restricted areas       Locked containers       Locked rooms  
 Locked file cabinets       Reinforced perimeters       Locked buildings  
(with or without guards)       Other Specify      Secure File Room
14.  Yes  No Does the PHA dispose of UIV information once the data has been used, served its purpose and the PHA no longer needs to maintain this information in files? If yes, check all disposal methods the PHA uses.
- Burn       Shred       Erase       Other Specify

- The PHA is in compliance with UIV security procedures. (If **all** responses are “yes” in Section B)
- The PHA is **not** in compliance with UIV Security procedures. (If **any** response is “no” in Section B)

As a result of non-compliance, HUD field office staff will take the following actions:

- Immediately terminate the following users’ (list only the users IDs below) access to the Enterprise Income Verification (EIV) system. (Check here if the answer to **only question 8** is “no”) : **i.e. H12345**
- Immediately terminate **all** PHA users’ access to the Enterprise Income Verification (EIV) system. (Check here if in addition to **question 8**, the answer to any question is “no”)
- Schedule a follow-up UIV Review within 90 days of this review or sooner. (**Required for any PHA that is not in compliance with UIV Security Procedures.** **Note:** Field office staff is required to submit a new UIV Monitoring Report to HUD Headquarters for follow-up review)

**HUD Headquarters Use Only**

Date UIV Monitoring Report Received	MM/DD/YYYY
Date EIV System Termination(s) Confirmed	MM/DD/YYYY
Date Follow-up UIV Review Due	MM/DD/YYYY
Date Follow-up UIV Review Due	MM/DD/YYYY

**U.S. Department of Housing and Urban Development (HUD)  
Upfront Income Verification (UIV) Monitoring Report**

**C. ELIMINATION OF SUBSIDY PAYMENT AND TENANT RENT ERRORS THROUGH  
RESOLUTION OF UIV INCOME DISCREPANCIES**

**Requirements:** Field Office staff is responsible for selecting five (5) additional tenant files, **per program** reviewed, with the highest dollar income discrepancy at the **100%** threshold level as disclosed on a current Income Discrepancy report from the Enterprise Income Verification (EIV) system. Record the information from the Income Discrepancy Report in the tables below. Maintain a copy of the Income Discrepancy report used to select the files with your working papers. Indicate N/A if there are no families listed on the Income Discrepancy Report. If the PHA has an interim increase policy, staff should use the annualized last quarter annual income discrepancy amount, if it is greater than the actual annual income discrepancy amount – otherwise use the actual annual income discrepancy amount. If the PHA does **not** have an interim increase policy, staff should use the actual annual income discrepancy amount.

The Field Office staff should review tenant cases files and/or PHA documentation to ensure that the PHA is aware of the income discrepancy and has taken action to determine whether the income discrepancy is **valid** or **invalid**. In the event of a valid case, the Field Office staff is required to confirm that the PHA has taken the appropriate action to eliminate subsidy payment errors and tenant rent errors attributable to the valid income discrepancy. Some examples of appropriate corrective actions are: calculation of retroactive rent due to the PHA, correct monthly tenant rent share, execution of retroactive rent repayment agreement with tenant, and/or termination of assistance.

Place an “X” in the applicable column (valid or invalid) to indicate the classification of the income discrepancy.

**Valid** income discrepancies are those discrepancies where the tenant misrepresented his/her income.

**Invalid** income discrepancies are those discrepancies where the PHA has determined one of the following (insert **only** one reason code in the “reason invalid” column):

1. The PHA does not have an interim increase policy, thus the tenant was not required to report the income
2. The effective date of the income not reported was after the tenant interview date for the reexamination of income
3. The tenant disputes the data and has contacted the income source to request correction of the data
4. The tenant indicates he/she is the victim of identity theft and has submitted a police report or other documentation to support this claim
5. The tenant indicates that he/she has willingly shared his/her SSN with another person

**U.S. Department of Housing and Urban Development (HUD)  
Upfront Income Verification (UIV) Monitoring Report**

Specify date of Income Discrepancy Report used to select additional tenant files: 06/09/2009

<b>Public Housing – Check here if not applicable <input checked="" type="checkbox"/></b>							
Last 4 Digits of HOH's SSN	HOH's Last Name	Project Number	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid	Reason Invalid
			\$	\$			
			\$	\$			
			\$	\$			
			\$	\$			
			\$	\$			
<b>Totals</b>			<b>0</b>	<b>0</b>			

<b>Section 8 – Check here if not applicable <input type="checkbox"/></b>						
Last 4 Digits of HOH's SSN	HOH's Last Name	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid	Reason Invalid
0029	Balderas	\$51,549.39	\$65,771.17		X	2
6765	Clark	\$36,061.17	\$37,262.22		X	2
6491	Mathews	\$32,025.92	\$16,793.06	X		
5217	Washington	\$30,753.98	\$26,926.15	X		
8765	Jeffery	\$29,584.55	\$30,932.56		X	3
7341	Forbes	\$39,303.71	\$39,932.91		X	2
2235	Ramsey	\$42,474.01	\$17,549.89	X		
3860	Turner	\$26,067.00	\$35,328.00		X	2
4715	Spann	\$30,762.84	\$4,995.15	X		
5196	Anderson	\$25,752.48	\$21,540.75	X		
<b>Totals</b>		<b>\$344,335.01</b>	<b>\$297,194.16</b>	<b>5</b>	<b>5</b>	

**PHA Income Discrepancy Summary**

Program	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid
Public Housing	N/A	N/A		
Section 8	\$344,335.01	\$297,194.16	5	5
<b>Totals</b>	<b>\$344,335.01</b>	<b>\$297,194.16</b>	<b>5</b>	<b>5</b>

**U.S. Department of Housing and Urban Development (HUD)  
Upfront Income Verification (UIV) Monitoring Report**

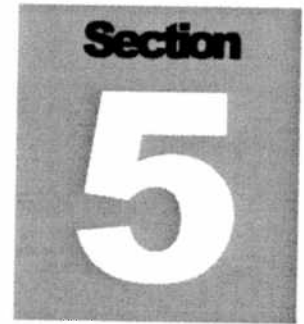
**HUD's completed Upfront Income Verification (UIV) Monitoring Report was provided to the following PHA staff person:**

Melissa Quijano, Director of HCV

06/17/2009

David Gunter, Chief Administrative Officer

06/17/2009



*Office of Fair Housing and Equal Opportunity (FHEO)*  
**AND**  
*Office of Public and Indian Housing (PIH)*

***ON-SITE LIMITED  
MONITORING REVIEW***

- ***Civil Rights Related Program  
Requirements Checklist***
- ***Section 504 Checklist***

**Please Note:**

*The following documents have been forwarded to the Houston Office of FHEO. After FHEO has reviewed all data, if civil rights and fair housing issues arise they will work directly with HCHA to resolve the problems.*

**ATTACHMENT A**  
4

**PART I. POSTING OF DOCUMENT/MATERIAL REQUIREMENTS**

Place an "x" in the appropriate column and provide comments whenever an explanation is warranted.

<b>Are the following displayed and readily visible or are they otherwise made available in accordance with the applicable regulations?</b>	<b>YES</b>	<b>NO</b>	<b>COMMENTS (if applicable)</b>
1. Equal Opportunity in Housing Poster (HUD 928.1-English/HUD 928.1A-Spanish) prominently displayed in all public areas. [24 CFR 110.15]	x		
2. Is the Public Housing Agency Plan readily available for public review? [24 CFR 903]	X		
3. Is the Administrative Plan available for public review. [24 CFR 982.54]	X		
4. Notice that the PHA must give the family information on how to fill out and file a housing discrimination complaint. [24 CFR 982.54 (d)(6); 982.304].	x		
5. Are policies, rules, and regulations posted in the project office? [24 CFR 966.5].	X		

**ATTACHMENT A**  
**5**

**PART II. OTHER**

	YES	NO	COMMENTS (if applicable)
1. Is there anything else that is related to civil rights or fair housing that should be noted? [For example, fair housing discrimination complaints brought against the PHA by its employees, or media reports of racial/ethnic tensions at the PHA's developments?] If yes, please note.		X	
2. Limited English Proficiency (LEP). Executive Order 13166, titled "Improving Access to Services by Persons with Limited English Proficiency," requires all agencies and their recipients to ensure that their programs provide meaningful access for LEP persons. (Final Guidance will be published in Federal Register, and is also noted in the Public Housing Occupancy Guidebook, Section 6.2 "Accessibility and Plan Language," page 68.)			
Has the PHA taken the following steps to ensure meaningful access to programs by LEP persons?	X		
<ul style="list-style-type: none"> <li>Conducted a four-factor analysis. If "yes," bring a copy to FHEO.</li> </ul>		X	
<ul style="list-style-type: none"> <li>Developed a written Language Assistance Plan? If "yes," bring a copy to FHEO.</li> </ul>		X	
<ul style="list-style-type: none"> <li>Hired bi-lingual staff.</li> </ul>	X		
<ul style="list-style-type: none"> <li>Contracted with a telephone language line services to provide interpretation for residents and applicants.</li> </ul>			N/A staff available

**ATTACHMENT B**

1

**OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)  
AND  
OFFICE OF PUBLIC AND INDIAN HOUSING (PIH)**

**ON-SITE LIMITED MONITORING REVIEW -- SECTION 504**

Public reporting burden for this collection of information is estimated to average 2 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information collected during the onsite comprehensive reviews of Public Housing Agencies (PHAs) will be used by HUD to evaluate the PHAs' compliance with civil rights and fair housing laws and regulations (Regulatory Authorities: 24 CFR 1.6(b); 24 CFR 8.55; 24 CFR 125). The information is subject to the confidentiality requirements of the HUD Reform Legislation. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

This checklist is to be completed by the Public Housing Agency (PHA), collected by Public and Indian Housing (PIH) during the on-site comprehensive/consolidated review. PIH will forward the completed checklist to FHEO within ten (10) business days of completing the PIH on-site comprehensive/consolidated review. If the data is not available for the reviewer to bring to FHEO, the PHA must forward the completed checklist directly to FHEO within five (5) business days of the PIH exit interview. This checklist is not intended to cover the full range of civil rights and fair housing concerns and PIH will not give any evaluation or analysis of the data. This checklist serves as an alert to PIH and FHEO to certain PHA practices regarding Section 504. Results are to be referred to FHEO for possible follow-up.

PIH should forward Attachment B "On-Site Limited Monitoring Review Section 504 Monitoring" checklist to the PHA for completion prior to the PIH on-site comprehensive/consolidated review. The PHA should be instructed that PIH will collect the completed checklist during the on-site comprehensive/consolidated review. PIH will then forward this material to FHEO within the appropriate timeframe.

PHA Name: Harris County

PHA Identification Number:  
TX441

Location:  
Houston

Name of Person Completing Checklist: Lorraine Walls

Title of Person Completing Checklist: Team Leader

**ATTACHMENT B**  
2

Telephone Number of Person Completing Checklist:

---

Date of Completion:  
6/18/09

---

- 1.a. If the PHA has fifteen (15) or more staff members, please provide the name of the PHA Section 504 Coordinator:  
Beverly Burroughs
- 1.b. If the PHA does not have a Section 504 Coordinator, identify the person who handles issues/questions regarding meeting the needs of persons with disabilities.  
Key Management Staff

These questions are directed to the person named in answer to Questions 1.a. or 1.b. If no one was named, the person in the PHA with the most knowledge concerning persons with disabilities should respond to these questions and that name should be indicated.

2. How many dwelling units has the PHA designated UFAS-accessible (i.e., comply with the Uniform Federal Accessibility Standards)? NOTE: An "accessible housing unit" is a dwelling unit that is designed, constructed, altered, or adapted to comply with UFAS and is located on an "accessible route."  
N/A
3. What is the distribution by bedroom size of the accessible dwelling units?

Bedroom size	TOTAL units	Number of UFAS-accessible units	Number of Units Accessible for hearing/visual impaired people
1 bedroom			
2 bedroom			
3 bedroom			
4 bedroom			
Other (specify)			
<b>TOTALS</b>			

4. How are requests from applicants or residents asking for a reasonable accommodation handled, if the PHA does not have a policy?  
Administrative Plan and HCHA Reasonable Accommodation Request Forms Provided
- 
- 
-

**ATTACHMENT B**

5. When is the reasonable accommodation policy given to an applicant?  
Upfront- Briefing and at initial intake  
appointment.  
\_\_\_\_\_  
\_\_\_\_\_
6. When is the reasonable accommodation policy given to present tenants?  
Briefing Packet and at their annual re-examination interview  
\_\_\_\_\_  
\_\_\_\_\_
7. Where there is no policy addressing assistance animals, how are applicants' or tenants' requests to have such animals handled?  
HCVP- Lease with  
owner  
\_\_\_\_\_  
\_\_\_\_\_
8. Is the tenant/applicant required to make a special deposit to have an assistance animal?  
N/A  
\_\_\_\_\_
9. Does the PHA have the required TTY/TDD or other equally effective telecommunications system? \_\_\_\_\_ Yes \_\_\_\_\_ No
10. What is the TTY/TDD number?  
\_\_\_\_\_
11. How does the PHA staff communicate with persons who have hearing, speech, and/or visual impairments? Identify the system used by the PHA.
- \_\_\_\_\_ TTY/TDD
  - \_\_\_\_\_ Interpreter
  - X Relay system
  - X Large print materials
  - \_\_\_\_\_ Braille
  - \_\_\_\_\_ Other (Specify) \_\_\_\_\_

ATTACHMENT B

4

12. Does the PHA's letterhead list:

\_\_\_\_\_ direct TTY number, provide number: \_\_\_\_\_ or  
\_\_\_\_\_ relay telephone service number, provide number: 713-578-2100

Main number

13. What reasonable accommodation assistance does the PHA provide for persons seeking Housing Choice Voucher (formerly Section 8) housing?

\_\_\_\_\_ Extension of time to find housing

\_\_\_\_\_ Exception to fair market rent

\_\_\_\_\_ Transportation

Other (Specify) All of the above

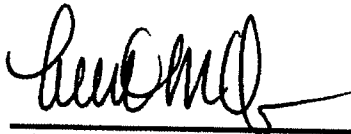
14. How many times in the last year has the PHA granted a fair market rent exception for persons with disabilities needing accessible features? None

15. Has a fair market rent exception ever been granted? None  
When? \_\_\_\_\_

16. Has a fair market rent exception ever been denied? None  
When? \_\_\_\_\_

17. What other rules or policies has the PHA implemented that affect persons with disabilities? (Identify.)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

As the duly authorized representative of the PHA, I certify to the best of my knowledge and belief that the information presented on this checklist is true and accurate.



Signature of Authorized Official

Melissa Quijano

Name Printed

Director of HCV

Title of Authorized Official

7-01-09

Date (mm/dd/yy)