



ROCHESTER
Housing Authority

Office of Compliance
Annual Report
2019

Opening doors to a brighter future



ROCHESTER
Housing Authority

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Office of Compliance Overview

VISION STATEMENT

We will be the change leader that other authorities call to learn from.

MISSION STATEMENT

Working as a team, we will build trust with each other and our clients to ensure clear compliance standards are accurately and consistently applied to all.



Message from Interim Deputy Executive Director

I am pleased to present the first Annual Report of the Rochester Housing Authority's (RHA) Office of Compliance. I want to personally thank RHA's Compliance staff for their hard work and dedication to ensuring accurate information is provided in a timely manner, and that our customers are treated courteously and fairly.

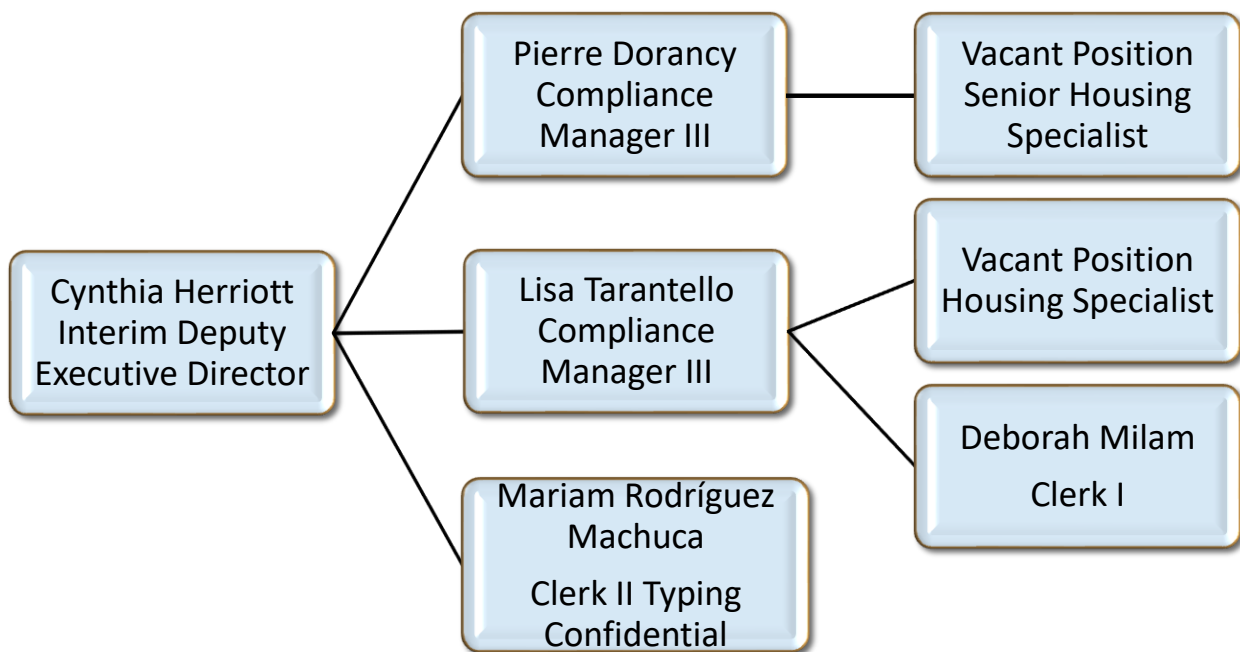
2019 included many efforts to streamline and improve operations across RHA. Highlights of activities this past year include:

- A complaint log and procedure to document complaints coming into RHA
- The creation of a Case Management System that identifies and tracks all investigations, projects, and legal matters reported to Compliance that involve RHA
- An updated authority-wide Emergency Incident Plan
- Establishment of an associate Hotline to make anonymous complaints via phone and email through an independent company
- Establishment of a Hotline for non-employees to file anonymous complaints about fraud and program abuse via phone or email
- A Housing Law Handout for associates, in partnership with Legal Counsel
- Legal Training for all applicable RHA associates
- Cultivation of professional partnerships with local police and fire agencies
- Creation of a formal internal Audit Operating Procedure
- New and updated procedures for Informal Hearings
- Updates to the FOIL (Freedom of Information Law) process



Sincerely,
Cynthia Herriott L.P.E.C., M.S.
Interim Deputy Executive Director
Rochester Housing Authority

Office of Compliance Organizational Chart



Office of Compliance

2019 Accomplishments

- Emergency Incident Plan – The Emergency Incident Plan was professionally audited and updated.
 - We will work with the Rochester Fire Department and the Rochester Police Department to test the plan, utilizing a scenario-based exercise, following their review of the materials.
- Security Cameras Project – A project to replace the camera system that monitors RHA properties is currently in progress.
- The Public Safety Strategy has been updated, directly correlating to a 4.6% decrease in calls.
- Compliance worked closely with the NYS Office of Temporary and Disability Assistance to ensure compliance with state regulations in Public Housing.
- The Federal HUD Office of the Inspector General (OIG) – A new mandate from the U.S. Senate was implemented in 2019 to examine HUD participant rolls for anyone with a criminal warrant for their arrest. OIG contacts RHA’s Compliance Office with these requests and we will continue to work closely with the OIG on this effort.
- The Deputy Executive Director implemented an anonymous Hotline Service by a third party vendor for staff use, and a separate one for non-staff.

Office of Compliance

2019 Accomplishments, cont.

- Termination Hearings and Due Process – Compliance met with defense attorneys from Law NY to explain RHA’s approach to the Informal Hearing process and to encourage communication.
- Housing Court –The Deputy Executive Director serves as RHA’s representative for this initiative. Increased communication has resulted in the prevention of several evictions from taking place. In some instances, the property owner violated HUD and municipal regulations.
- Housing Law Training – Judge Craig Doran, NYS Supreme Court Justice, presented to RHA associates and the Board of Commissioners on the court process and NYS Housing Laws.
- Eviction Study – RHA participated in a University of Rochester Eviction Study which looked at the eviction problem in Monroe county. RHA was selected because we appear to be more likely to work with tenants to prevent eviction.
- Housing Guest Protocol – The matter of when a visitor is no longer considered a guest was examined and a time frame identified. This plays a vital role in Public Safety Enforcement.
- Property Assessment – The Deputy Executive Director and the Public Housing Director walked each RHA Public Housing property and assessed any special problems or concerns.

Office of Compliance

2019 Accomplishments, cont.

- Public Safety has increased the coordination of criminal investigations with law enforcement to ensure RHA victims are best served.
- Tenants on Patrol – Worked with the resident commissioners to expand the number of volunteers in this program.
- Policies and Procedures – At the request of the Board of Commissioners, a complaint process was established to track and record complaints coming into the Authority.
- Memorandum of Use (MOU) – Revamped the MOU process where RHA commits to a contract with other providers. These are then reviewed by Legal Counsel.
- Enterprise Income Verification – All affected staff were trained by a Compliance Manager in this program use. This process identifies individuals that violate HUD regulations to any PHA around the country. In the past there was a delay in entering this data into the system which hampers Compliance efforts to recoup participant debt. Training has substantially improved staff compliance.

Office of Compliance

2019 Accomplishments, cont.

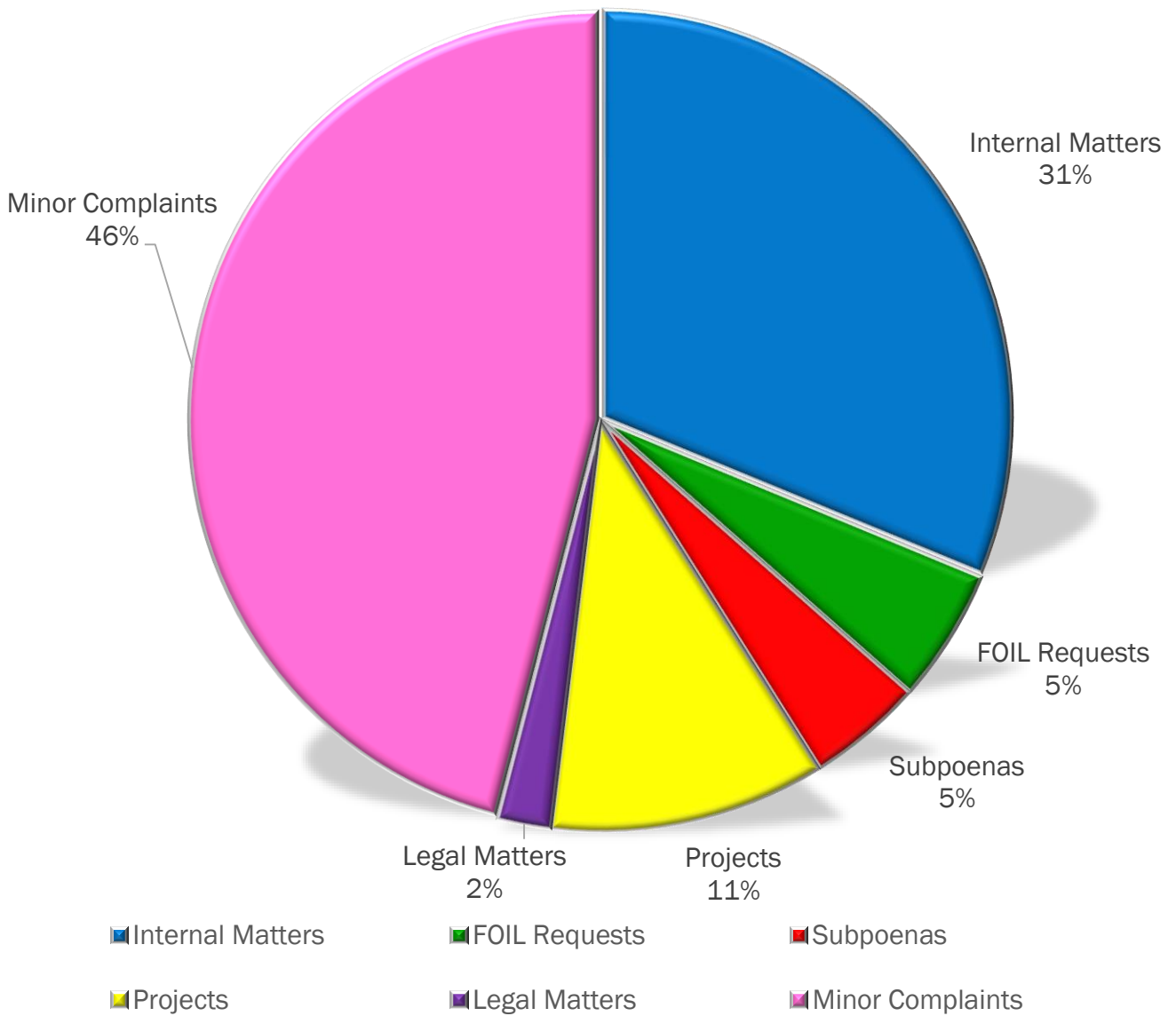
- The Deputy Executive Director serves as RHA's ex-officio representative on the Rochester Housing Charities (RHC) Board of Directors.
 - The RHC Board was asked by C. Herriott to direct their CPA to utilize the HUD required formula to update the budget and include the funds for tenant training, which are required under HUD regulations.
 - The board was asked to update the budget to include the loan interest payments made to RHA
 - The RHC Executive Director and board were advised on the HUD requirement that tenants have a right to hold meetings without staff in attendance. They were also provided with HUD regulations on this matter.
 - Current discussions are taking place to follow up on RHC's reimbursement to RHA for staff time and equipment during RHC's initial set up.

Office of Compliance

Key Performance Indicators

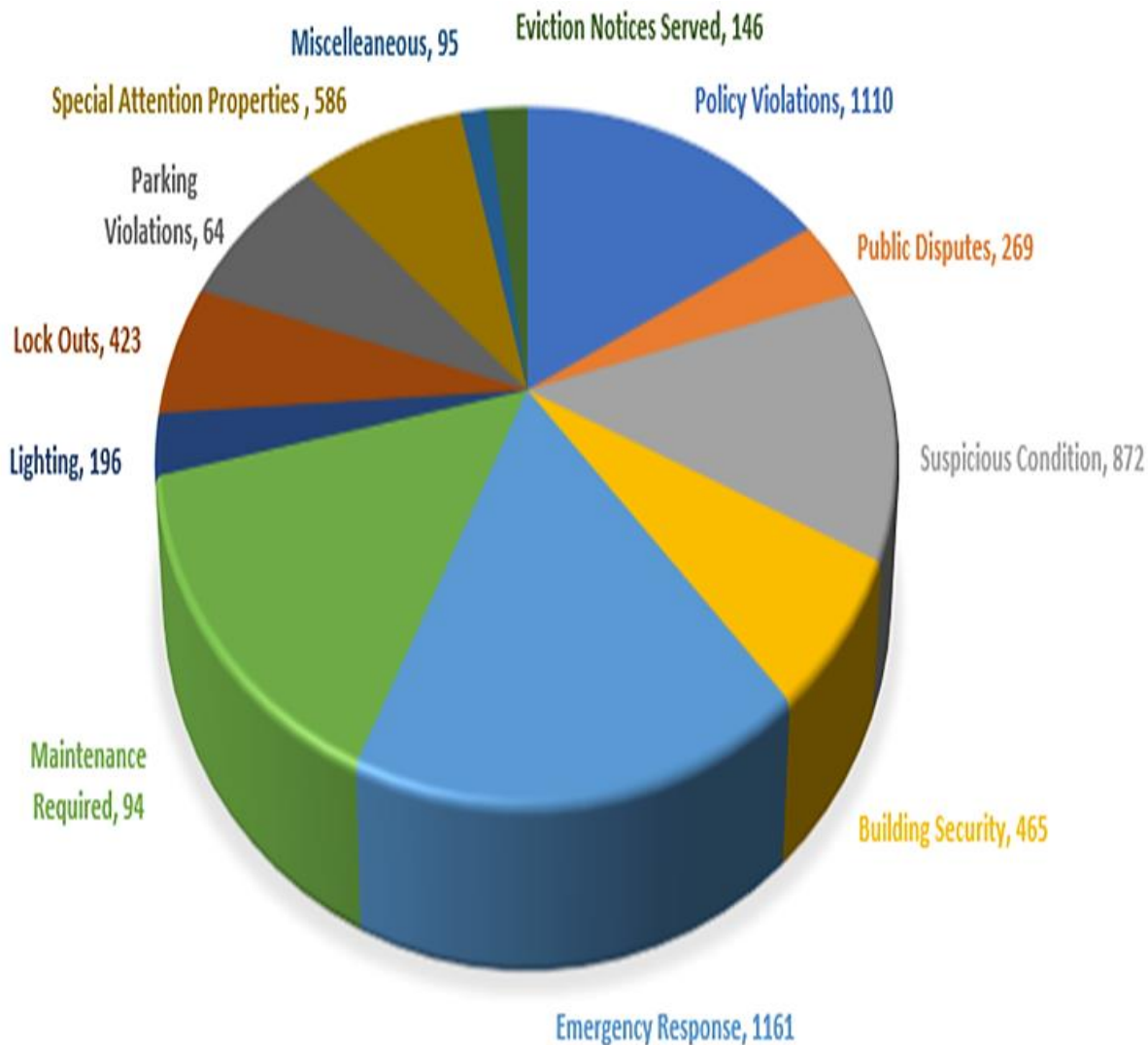
The following charts and statistical data are key ways that we measure our performance and assess outcomes.

Case Management

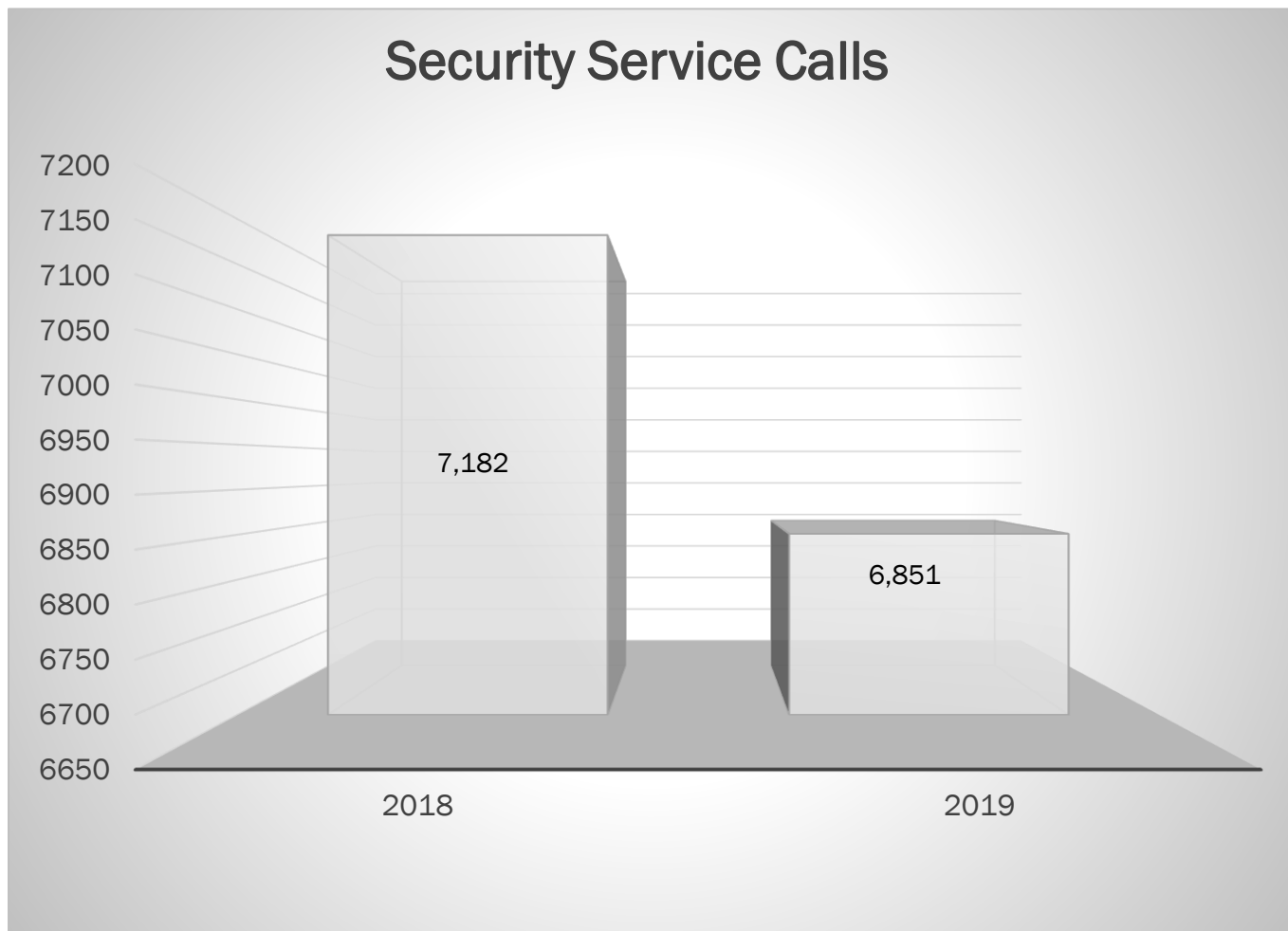


* This tracking system was developed by C.Herriott

2019 Cumulative Security Calls by Category

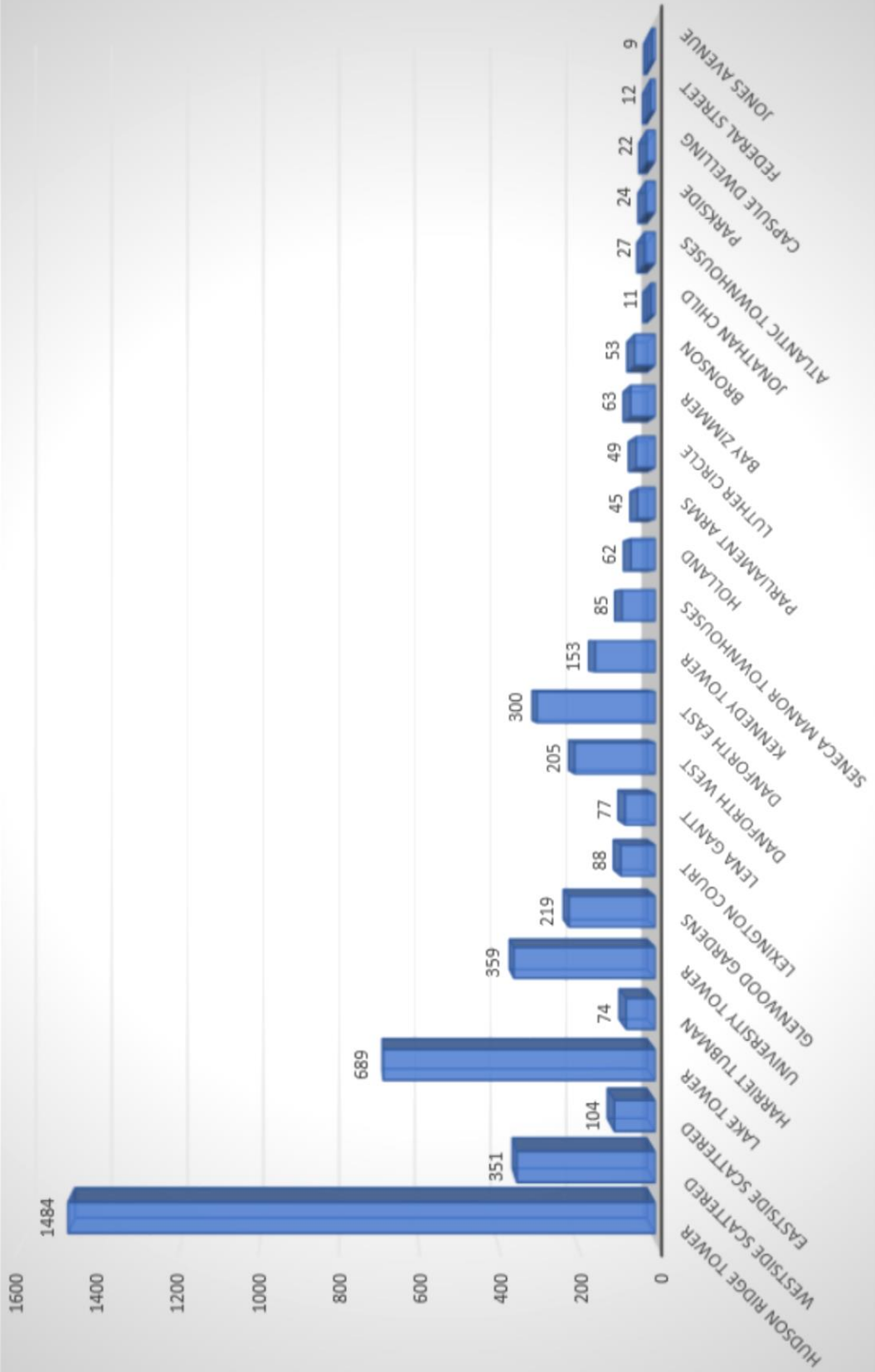


Year-over-Year Security Service Calls



*In 2019, there was decrease of 4.6% Security Service Calls in comparison to year 2018.

Total 2019 Security Service Calls



2019 Open Claims

Description	Amount
Open Property Loss Claims	5
Open Liability Loss Claims	7

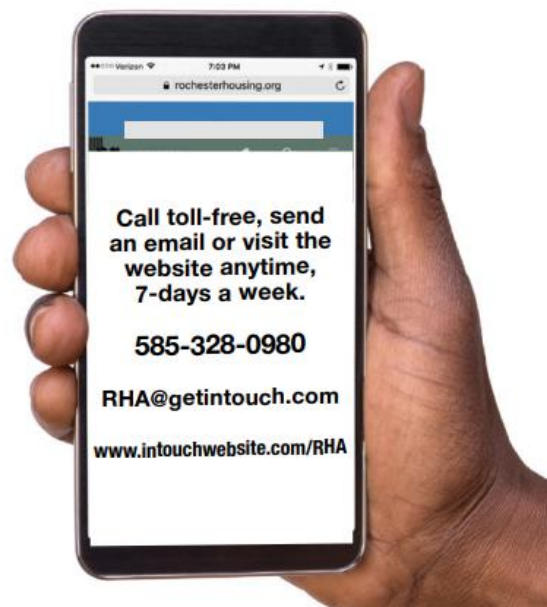
2019 Audit and Review

Audits performed by Compliance in 2019:

- Permanent Supportive Housing (PSH) Program - Leasing Operations
- Finance Department
- Procurement
- Application Processing Center
- Capital Projects
- Family Self Sufficiency Program

2019 Hotline Complaints

Department	Number of Complaints
Leasing Operations	29
Public Housing	2
Involving an Employee	8
Incomplete Information	5
Total Amount of Complaints	44



Program Violation Referrals

Outstanding Program Violation Referrals	Amount
Year 2019	356
Balance to be processed	1,395 *

Under HUD regulations, PHAs cannot forgive debts owed. We are required to recoup monies owed or repay the debt utilizing non-HUD funds. Currently we are addressing 2015 fraud complaints.



Fraud Investigations Year-over-Year

Department	Description	2018	2019
Leasing Operations	Repayment Agreement Payment Totals YTD	\$117,446.92	\$90,492.50
Leasing Operations	Collected to-date (Since 2017)	\$137,188.00	\$328,881.68
Public Housing	Repayment Agreement Payment Totals YTD for Vacated Arrears	\$29,251.00	\$27,182.67
Public Housing	Collected to-date (Since 2017)	\$11,036.00	\$12,854.52

**Impact of increased Repayment Agreements*

** Financial repayment commitments have been doubled since Authority-wide Compliance was established, due in large part to Housing Specialist A.*

2019 Termination Hearings

Description	Amount
Total Hearings Requested	125
Reinstatement (Cases resolved without a hearing)	49
Overtured	14
Adjourned	19
Upheld	43



Office of Compliance: Impacts on Performance

During the 2018-2019 Fiscal year a temporary hold was placed on filling the Housing Specialist position in the budget. While RHA saved on the associate’s salary, other costs resulted.

Hearings on average took two additional months per participant. Because RHA is required to pay the tenant’s rent until the decision under HUD regulations, the additional cost to RHA for this term is \$33,193, which is the equivalent salary of the position.

Year 2017	Count	Percent Count	Dollar	Percent Dollar
Termination	48	15.53%	\$183,958	47.11%
Repayment	149	48.22%	\$193,628	49.59%
Dismissal	111	35.92%	\$12,868	3.30%
Pending	1	0.32%	\$0	0.00%
Total	309	100%	\$390,454	100%

HS-A	Count	Percent
Termination	32	11.76%
Repayment	137	50.37%
Dismissal	103	37.87%
Pending	0	0.00%
Total	272	100%

HS-B	Count	Percent
Termination	16	43.24%
Repayment	12	32.43%
Dismissal	8	21.62%
Pending	1	2.70%
Total	37	100%

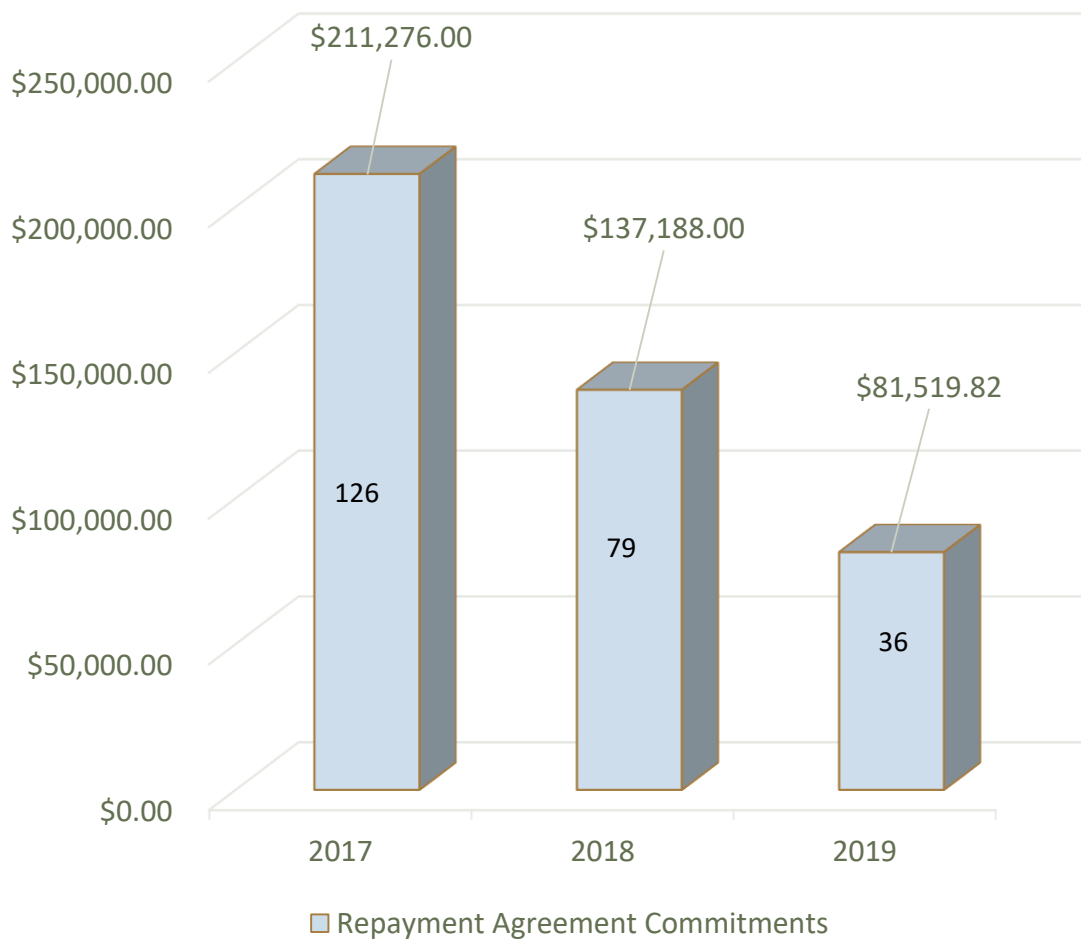
Impacts on Performance, cont. – Outstanding Debt:

Outstanding Referrals	1395
Conversion Rate	48%
Repayment Agreement Result	670
Average Repayment Agreement Amount	\$1,876
Potential	\$1,256,162

*Comparison of Year 2017 (Fully staffed) and 2019.

Impacts on Performance, cont.

Repayment Agreement Commitments



Closing Remarks

- We've made major accomplishments since the Office of Compliance was established. We seek continuous improvement.
- Future goals:
 - A fulltime Housing Specialist that will work on Public Housing Audit and Policy matters
 - A budget line for the Morale and Inclusion Committee
 - Establishment of an Ethics Review Committee
 - Utilize the Security Module in the TenDocs Program to better manage Public Safety
 - Develop of a Risk Assessment.