
HOUSING AUTHORITY OF THE CITY OF RICHMOND

SINGLE AUDIT REPORT

FOR THE YEAR ENDED JUNE 30, 2013

 **Patel &
Associates**
Certified Public Accountant

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SINGLE AUDIT REPORT
FOR THE YEAR ENDED JUNE 30, 2013**

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**INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH GOVERNMENT AUDITING STANDARDS**

The Board of Commissioners
Housing Authority of the City of Richmond
Richmond, California

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the business-type activities and the discretely presented component unit of Housing Authority of the City of Richmond as of and for the year ended June 30, 2013, and the related notes to the financial statements, which collectively comprise Housing Authority of the City of Richmond's basic financial statements, and have issued our report thereon dated February 25, 2014.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered Housing Authority of the City of Richmond's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Housing Authority of the City of Richmond's internal control. Accordingly, we do not express an opinion on the effectiveness of Housing Authority of the City of Richmond's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of Housing Authority of the City of Richmond's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as findings 2013-001 and 2013-002 that we consider to be significant deficiencies.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Housing Authority of the City of Richmond's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings and questioned costs as items 2013-003 and 2013-004.

The Authority's Response to Findings

Housing Authority of the City of Richmond's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. Housing Authority of the City of Richmond's responses were not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Housing Authority of the City of Richmond's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Patricia A. Aronowitz
Oakland, California
February 25, 2014

**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH
MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER
COMPLIANCE; AND REPORT ON THE SCHEDULE OF EXPENDITURES OF
FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133**

The Board of Commissioners
Housing Authority of the City of Richmond
Richmond, California

Report on Compliance for Each Major Federal Program

We have audited Housing Authority of the City of Richmond's compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of Housing Authority of the City of Richmond's major federal programs for the year ended June 30, 2013. Housing Authority of the City of Richmond's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of Housing Authority of the City of Richmond's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about Housing Authority of the City of Richmond's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of Housing Authority of the City of Richmond's compliance.

Opinion on Each Major Federal Program

In our opinion, Housing Authority of the City of Richmond, complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2013.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying schedule of findings and questioned costs as items 2013-003 and 2013-004. Our opinion on each major federal program is not modified with respect to these matters.

Housing Authority of the City of Richmond's response to the noncompliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. Housing Authority of the City of Richmond's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control over Compliance

Management of Housing Authority of the City of Richmond is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered Housing Authority of the City of Richmond's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of Housing Authority of the City of Richmond's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we identified certain deficiencies in internal control over compliance as described in the accompanying schedule of findings and questioned costs as items 2013-003 and 2013-004 that we consider to be significant deficiencies.

Housing Authority of the City of Richmond's responses to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. Housing Authority of the City of Richmond's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on it.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

Report on Schedule of Expenditures of Federal Awards Required by OMB Circular A-133

We have audited the financial statements of Housing Authority of the City of Richmond as of and for the year ended June 30, 2013, and have issued our report thereon dated February 25, 2014, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditure of federal awards is fairly stated in all material respects in relation to the financial statements as a whole.

PwC
Oakland, California
February 25, 2014

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED JUNE 30, 2013**

Federal Grantor/ Pass-Through Grantor <u>Program or Cluster Title</u>	Federal CFDA <u>Number</u>	Program Expenditures
<u>Department of Housing and Urban Development</u>		
Direct Programs:		
Low Income Housing Program	14.850	\$ 2,225,213
Demolition and Revitalization of Severely Distressed Public Housing (HOPE IV)	14.866	20,761
Section 8 Housing Choice Vouchers	14.871	19,727,605
Lead Based Paint Hazard Control in Privately Owned Housing	14.907	349,757
Public Housing Capital Fund	14.872	<u>758,334</u>
Total Department of Housing and Urban Development		<u>23,081,670</u>
Total Expenditures of Federal Awards		\$ <u><u>23,081,670</u></u>

See accompanying notes to Schedule of Expenditures of Federal Awards

HOUSING AUTHORITY OF THE CITY OF RICHMOND
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2013

*Note 1: **Basis of Presentation***

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal grant activity of the Housing Authority of the City of Richmond under programs of the federal government for the year ended June 30, 2013. The information in this schedule is presented in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Government, and Non-Profit Organizations*. Because the schedule presents only a selected portion of the operations of Housing Authority of the City of Richmond, it is not intended to and does not present the financial position, changes in net position or cash flows of Housing Authority of the City of Richmond.

*Note 2: **Summary of Significant Accounting***

Summary of significant accounting refers to *when* revenues and expenditures or expenses are recognized in the accounts and reported in the financial statements, regardless of the measurement focus applied. All proprietary funds are accounted for using the accrual basis of accounting. Expenditures of Federal Awards reported on the Schedule are recognized when incurred.

*Note 3: **Direct and Indirect (Pass-Through) Federal Awards***

Federal awards may be granted directly to the Authority by a federal granting agency or may be granted to other government agencies which pass-through federal awards to the Authority. The Schedule includes both of these types of Federal award programs when they occur.

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2013**

SECTION 1 - SUMMARY OF AUDITOR'S RESULTS

Financial Statements

Type of auditor's report issued: *Unmodified*

Internal control over financial reporting:

- Material weaknesses identified? No
- Significant deficiencies identified? Yes

Noncompliance material to financial statements noted? No

Federal Awards

Internal control over major programs:

- Material weaknesses identified? No
- Significant deficiencies identified? Yes

Type of auditor's report issued on compliance for major programs: *Unmodified*

Any audit findings disclosed that are required to be reported in accordance with Section 510(a) of OMB Circular A-133? Yes

Identification of major programs:

<u>CFDA Number</u>	<u>Name of Federal Program</u>
14.850	Low-Income Housing Program
14.871	Section 8 Housing Choice Vouchers

Dollar threshold used to distinguish between type A and type B programs: \$692,450

Auditee qualified as low-risk auditee? No

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2013**

SECTION II - FINANCIAL STATEMENT FINDINGS

Finding 2013-001: Financial Status

Criteria:

Good controls require that the operations of the Authority are running effectively and there is adequate planning to ensure that there are no deficits or deficits are minimized.

Condition:

Although during fiscal year 2012-13, the Authority underwent a series of debt reconstruction, the operations had deficit on account of restructuring at June 30, 2013, current assets exceeded current liabilities by \$2.17 million, but for the year ended June 30, 2013, operating expenses still exceeded operating revenues by \$3.29 million, although the extent of operating loss reduced compared with \$5.79 million in fiscal year 2011-12. This condition was identified as a material weakness in the prior year.

Effect:

The Authority's financial condition will make it difficult to fulfill its commitment to pay the bills in a timely manner and meet other debt obligations.

Cause:

The Authority's operating expenses exceed its federal funding.

Recommendation:

We recommend the Authority identify ways to improve its operation efficiency to regain financial health.

Views of Responsible Officials and Planned Corrective Actions:

With the selling of the Housing Authority component unit and the relocation of RHA finance division staff to the City of Richmond finance department for fiscal oversight and supervision, the Authority will continue to strengthen and improve its operational efficiency and financial stability.

Name of Contact Persons: Tim Jones, Executive Director and Anthony Taplin, Finance Manager
Anticipated Date of Completion: March 31, 2014

Finding 2013-002: Review of the Bank Reconciliations

Criteria:

In order to have better control over cash and bank reconciliations, the Authority should indicate on the face of monthly bank reconciliations that they have been reviewed and approved in a timely manner by an individual other than the preparer.

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2013**

Condition:

There was no indication on the face of bank reconciliations that they have been reviewed and approved by an individual other than the preparer. This condition was identified as a significant deficiency in the prior year.

Effect:

Staff may not detect errors in the bank reconciliation in a timely manner

Cause:

Review of bank reconciliation was overlooked.

Recommendation:

We recommend the Authority review, sign and date monthly bank reconciliations in a timely manner.

Views of Responsible Officials and Planned Corrective Actions:

Although the bank reconciliations were reviewed by the Finance Manager, he did not sign and date to demonstrate it was reviewed in a timely manner.

Name of Contact Person: Anthony Taplin, Finance Manager

Anticipated Date of Completion: February 1, 2014

SECTION III - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

Finding 2013-003: Physical Inventory of Low Income Public Housing Equipment

Federal Agency: Department of Housing and Urban Development

Program Affected: Low-Income Housing Program (CFDA # 14.850)

Criteria:

The A-102 Common Rule for equipment acquired under Federal awards received directly from a Federal awarding agency states that equipment records shall be maintained, a physical inventory of equipment shall be taken at least every two years and reconciled to the equipment records.

Condition:

The Authority has been unable to provide current records or documents to verify a physical inventory has been completed for equipment. This condition was identified as a significant deficiency in the prior year.

Effect:

The Authority is unable to verify compliance with the A-102 Common Rule for equipment acquired under Federal awards received directly from a Federal awarding agency.

Cause:

The Authority does not have a procedure to maintain equipment records by funding source for the Low Income Housing Program.

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2013**

Recommendation:

The Authority should perform a physical inventory and reconciliation at least once every two years for equipment acquired with federal funds from Low Income Housing Program.

Views of Responsible Officials and Planned Corrective Actions:

Although the Housing Authority has a procedure for maintaining equipment records, we will coordinate with the City of Richmond Fixed Asset Division to conduct a physical equipment inventory biennially.

Name of Contact Person: Anthony Taplin, Finance Manager
Anticipated Date of Completion: June 30, 2014

Finding 2013-004: Housing Quality Standard Inspections

**Federal Agency: Department of Housing and Urban Development
Program Affected: Housing Choice Voucher (CFDA # 14.871)**

Criteria:

The Authority must inspect the unit leased to a family at least annually to determine if the unit meets Housing Quality Standards (HQS).

Condition:

During our testing of tenant files, we came across instances of late HQS inspection as described below:

In case of 2 out of 25 units selected for our testing, we noted that the Authority did not conduct annual HQS inspection until four and seven months, respectively, after the required inspection dates.

Effect:

Failure to conduct annual HQS inspection in a timely manner may result in landlords of unqualified units continue to receive federal rental assistance payments with the risk to their tenants or required routine maintenance unaddressed, which could result in substantial repair costs or serious injury.

Cause:

The Authority was late in the annual HQS inspection.

Recommendation:

The Authority should conduct annual HQS inspection in a timely manner.

Views of Responsible Officials and Planned Corrective Actions:

We agree with this finding. A long term Housing Authority staff member responsible for scheduling H.Q.S. inspections retired during the fiscal year, thus causing a delay in inspections. Subsequently, staff has been reassigned to schedule inspections.

Name of Contact Person: William Bounthon, Assisted Housing Manager
Anticipated Date of Completion: January 1, 2013

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
STATUS OF PRIOR YEAR FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2013**

FINDINGS

STATUS

SECTION II - FINANCIAL STATEMENT FINDINGS

Prior year audit disclosed significant deficiencies and material weaknesses and instances of noncompliance material to the basic financial statements as listed below.

MATERIAL WEAKNESSES:

Finding SA2012-1: Cash Balances and Going Concern – Update

Condition:

As reported in prior year, the Board had engaged an audit firm to perform an audit of the Authority's financial statements and opine on the Authority's financial statements and provide assurance to readers of the statement, including the Board, that they are prepared in accordance with generally accepted accounting principles. The Authority's financial statements are prepared assuming the Authority is a going concern. That is, the assumption that Authority has the ability to pay its bills as they come due without substantial disposition of assets outside the normal course of operations, restructuring of debt or forced revisions of its operations. As part of that work the auditors are required to consider conditions and events which indicate that there is substantial doubt about the Authority's ability to continue as a going concern through June 30, 2013, its next fiscal year end. Conditions which indicate there is substantial doubt about the Authority's ability to pay its bills on time include:

- June 30, 2012 current liabilities exceeded current assets by \$5.2 million.
- For the year ended June 30, 2012, operating expenses exceeded operating revenues by \$5.9 million.

Partially implemented.
See current year finding 2013-001.

In cases where there is substantial doubt about an entity's ability to continue to operate, there are two primary considerations auditors are required to address that affect the audit opinion. The first consideration is the disclosure of the issue in the audit opinion. This additional paragraph is considered a modification and informs the reader that there is substantial doubt about the entity's ability to continue. A modification was included in the report for prior year.

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
STATUS OF PRIOR YEAR FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2013**

FINDINGS

STATUS

SIGNIFICANT DEFICIENCIES:

Finding SA2012-2: Preparation and Review of the Bank Reconciliation

Condition:

The March 2012 and June 2012 bank reconciliations did not indicate when they were prepared or reviewed, or by whom.

Partially implemented.
See current year finding
2013-002.

Finding SA2012-3: Journal Entry Review Process

Condition:

In prior year 25 manual journal entries for control testing over the journal entry process were selected. It was noted that 16 out of the 25 selections did not provide audit evidence that someone other than the preparer was reviewing the journal entries prior to them being posted to the general ledger.

Implemented.

Finding SA2012-4: Purchasing Policy – Purchase Orders and Contracts

Condition:

In prior year 25 disbursements to test the Authority's compliance with its procurement policy were selected. During the test, it was noted seven of the disbursements tested were below the \$100,000 threshold and did not have purchase orders.

Implemented.

SECTION III - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

Finding SA2012-5: Implementing a Budget for All Asset Management Properties

Implemented.

**Federal Agency: Department of Housing and Urban Development (HUD)
Program Affected: Low-Income Housing Program (CFDA # 14.850)**

Condition:

In fiscal year 2011-12, the Housing Authority of the City of Richmond implemented the accounting for the asset management for each property but did not implement the budget for each property.

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
STATUS OF PRIOR YEAR FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2013**

FINDINGS

STATUS

Finding SA2012-6: Omission of Section 8 Voucher Utility Allowance Form
Federal Agency: Department of Housing and Urban Development (HUD) Implemented.
Program Affected: Section 8 Housing Choice Vouchers (CFDA # 14.871)

Condition:

Per testing of the November 2011 Section 3 tenant files, there appeared to be no audit evidence of a utility allowance from attached to the most recent annual examination for three of sixty selected tested files.

Finding SA2012-7: Physical Inventory of Low Income Public Housing Equipment
Federal Agency: Department of Housing and Urban Development (HUD) Not implemented. See
Program Affected: Low Income Housing Program (CFDA # 14.850) current year finding
2013-003.

Condition:

The Authority has been unable to provide current records or documents to verify a physical inventory has been completed for equipment. It was also noted that the tests of seven out of 66 Installation/Disposition Forms dated: July 7, 2011; November 16, 2011; January 4, 2012; February 10, 2012; March 1, 2012; April 4, 2012 and May 22, 2012 and noted there was no authorizing signature on the forms.

Finding SA2012-8: Depository Agreements
Federal Agency: Department of Housing and Urban Development (HUD) Implemented.
Program Affected: Low-Income Housing Program (CFDA # 14.850) and Section 8 Housing Choice Vouchers (CFDA # 14.871)

Condition:

The Authority did not have the required HUD-51999 depository agreement executed during the fiscal year.

Finding SA2012-9: Submission of HUD 60002, Section 3 Summary Report, Economic Opportunities for the Public Housing Capital Fund Programs
Federal Agency: Department of Housing and Urban Development (HUD) Implemented.
Program Affected: Public Housing Capital Fund (CFDA # 14.872) and ARRA-Funded Public Housing Capital Fund Stimulus Recovery Act Funded (CFDA # 14.885)

**HOUSING AUTHORITY OF THE CITY OF RICHMOND
STATUS OF PRIOR YEAR FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2013**

Condition:

The Authority did not submit HUD 60002 for fiscal year 2011-12 for its Public Housing Capital Fund Program grants.

Finding SA2012-10:Housing Quality Standards Inspection Enforcements

Federal Agency: Department of Housing and Urban Development (HUD) Implemented.

Program Affected: Section 8 Housing Choice Vouchers (CFDA # 14.871)

Condition:

Selection of forty failed inspections to verify whether the files documented the correction of the HQS deficiencies were repaired within the required timeframe. It was also verified whether the Authority stopped HAPs because the owner did not correct the repairs.

It was noted that four of the failed inspections did not have proper documentation and an inspector was not available for re-inspection within the required timeframe.