



CHICAGO HOUSING AUTHORITY

OFFICE OF THE  
INSPECTOR GENERAL

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2023 QUARTER 4 REPORT





**CHICAGO HOUSING AUTHORITY  
OFFICE OF THE INSPECTOR GENERAL  
INSPECTOR GENERAL KATHRYN B. RICHARDS  
60 E. VAN BUREN, 7th FLOOR, CHICAGO, IL 60605**

January 15, 2024

To Chairperson Hurlock, Vice-Chairman Brewer, and Distinguished Members of the Finance and Audit Committee:

Enclosed is the 2023 Fourth Quarter Report on the activities of the Chicago Housing Authority (CHA) Office of the Inspector General (OIG) from October 1, 2023, through December 31, 2023. Highlights of OIG work this quarter include the following:

- **\$83,103.59 in restitution ordered to the CHA** – In the case of People v. Spruill, a former a property manager pleaded guilty to theft of thousands in tenant rent. This order brings the OIG’s orders of restitution in 2023 to a total of **\$841,848.91**.
- **Draft Audit of Rent Collection at CHA’s Mixed Finance/Mixed Income Properties** – The OIG issued a draft report to management. The report will be finalized in the first quarter of 2024.
- **Nine OIG investigations closed sustained** – These investigations resulted in findings of fraud, mismanagement, and misconduct involving HCV and Public Housing participants, CHA contractors, CHA employees.
- **Audit and Program Review Procedures Manual** – In December 2023, the OIG finalized internal procedures to provide guidance and consistency in OIG Audit activities.
- **Three OIG staff attend the Annual Conference of the Association of Inspectors General** – The conference, held in New York City, provided valuable training and the opportunity to network with inspector general professionals from across the country.
- **OIG Holds First Open House Event** – The OIG invited CHA employees to visit the OIG office, enjoy coffee and doughnuts, and meet OIG staff in a relaxed setting. The event allowed employees to learn more about the OIG and develop individual connections with OIG employees. The OIG later held an **OIG Meet and Greet** event for CHA employees stationed at the Charles A. Hayes Family Investment Center.

As we close out 2023, I am proud of the work of the OIG's dedicated employees. Together, and with the cooperation of CHA management staff, we continually seek to improve CHA operations, and eliminate fraud, waste, and abuse in CHA programs. This work is particularly important now, given the severe lack of affordable housing in the City of Chicago.

Our shared goals of increasing the availability of safe, affordable housing throughout Chicago, make communication and collaboration all the more critical. The OIG welcomes all suggestions and concerns. Please do not hesitate to contact me directly at [krichards@thecha.org](mailto:krichards@thecha.org) or contact us through our anonymous web portal, at <https://www.thecha.org/report-fraud>.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kathryn Richards". The signature is written in a cursive, flowing style.

Kathryn B. Richards  
Inspector General

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# Mission

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The OIG is an independent oversight agency, created by the CHA Board of Commissioners, to promote economy, efficiency, and integrity in the administration of programs and operations of the Chicago Housing Authority. The OIG achieves this mission through:

- Criminal and Administrative Investigations
- Investigative Support to Partner Agencies
- Performance Audits
- Program Reviews & Advisories
- Analytics
- Training and Fraud Prevention
- Communications and Outreach

The OIG partners with law enforcement agencies to pursue criminal prosecutions of fraud or other crimes affecting the CHA. In administrative matters, the OIG issues reports of findings and recommendations to ensure that CHA participants and residents are in compliance with program requirements, and that officers, employees, and vendors are held accountable for operating with integrity and running an efficient, cost-effective operation. Through audits, reviews, and analytics, the OIG seeks to prevent, detect, and eliminate fraud, waste, abuse, and misconduct in CHA's programs and operations. Finally, through training, communications, and outreach, the OIG seeks to prevent fraud and other misconduct, raise awareness of common fraud indicators, and provide multiple avenues for reporting such concerns to ensure the CHA remains responsive and accountable to its stakeholders.

Ultimately, the OIG seeks to ensure the CHA is best equipped to serve its overarching mission to "leverage the power of affordable, decent, safe, and stable housing to help communities thrive and low-income families increase their potential for long-term economic success and a sustained high quality of life."





# Professional Standards

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## OIG INVESTIGATIONS

The OIG conducts investigations in accordance with the Association of Inspectors General Principles and Standards for Offices of Inspectors General (the "Green Book"), generally accepted principles, quality standards and best practices applicable to federal, state, and local offices of inspectors general. These include both general standards and qualitative standards. Additionally, the OIG always exercises due professional care and independent, impartial judgment in conducting investigations and the issuance of reports and recommendations.

## OIG AUDITS & PROGRAM REVIEWS

The OIG conducts audits of programs in accordance with Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States and Principles and Standards for the Offices of Inspector General (the "Yellow Book").

Yellow Book standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

The adherence to these standards ensures that audits and program reviews comprise the requisite independence, planning, staff qualifications, direction and control, confidentiality, and quality assurance.

Every three years, the OIG submits to an independent peer review conducted by members of the national Association of Inspectors General to ensure compliance with these governing standards.

The CHA OIG has been found to meet all relevant standards in each period reviewed, including the most recent review, which encompassed OIG's work for the years 2019-2021. The CHA OIG's next peer review will occur in 2025.

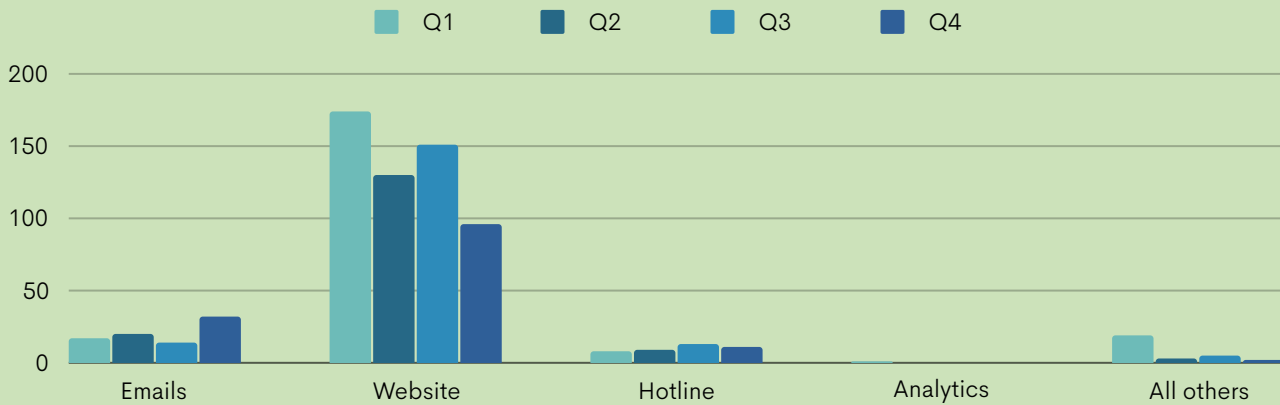
# Complaints

The OIG accepts complaints through its online web portal, by email, telephone hotline, employee complaint drop boxes, and in-person reports. Complainants may choose to remain anonymous. The OIG initiates investigations, reviews, and audits in response to complaints or concerns it receives or upon the OIG’s initiative. Following a preliminary review and assessment of the complaint, OIG staff make a determination on whether to open an investigation or review. Matters may be declined for a variety of reasons including but not limited to: insufficient information, lack of jurisdiction, or no violation presented.

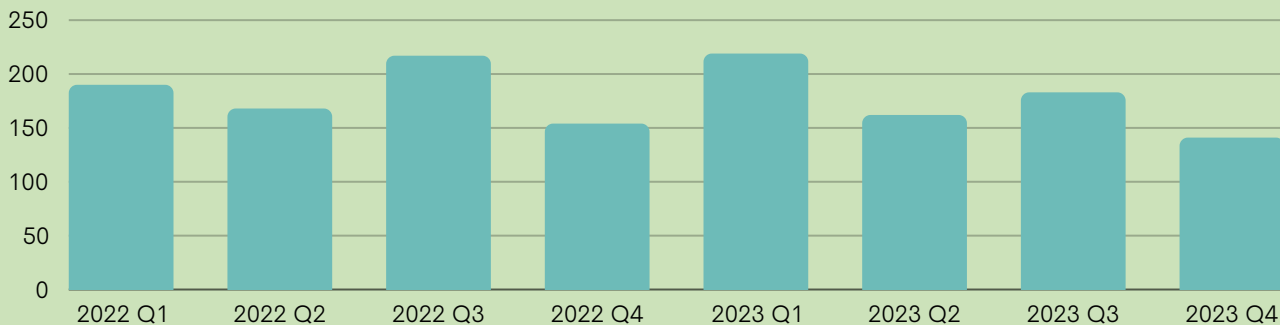
The OIG received **141** complaints in the fourth quarter of 2023, and a total of **705** complaints in 2023, 3.3% less than the 2022 total of 729. Of those complaints received in Q4, the OIG referred **80** to various relevant CHA departments and outside agencies; and declined **44**. The OIG opened **8** complaints for investigation, including 1 from a previous quarter. At the end of the quarter, **11** complaints received in Q4 remained pending for evaluation, and an additional **7** remained pending from previous quarters, for a total of **18** pending complaints.

Below are a series of tables showing statistical information on the OIG complaints received this quarter.

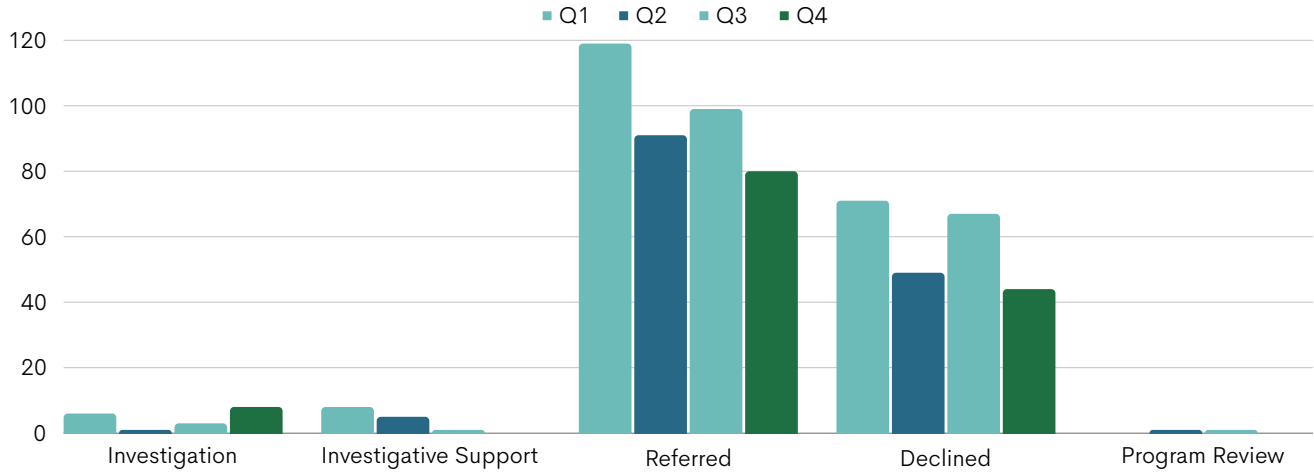
**Complaints by Method Q4 2023**



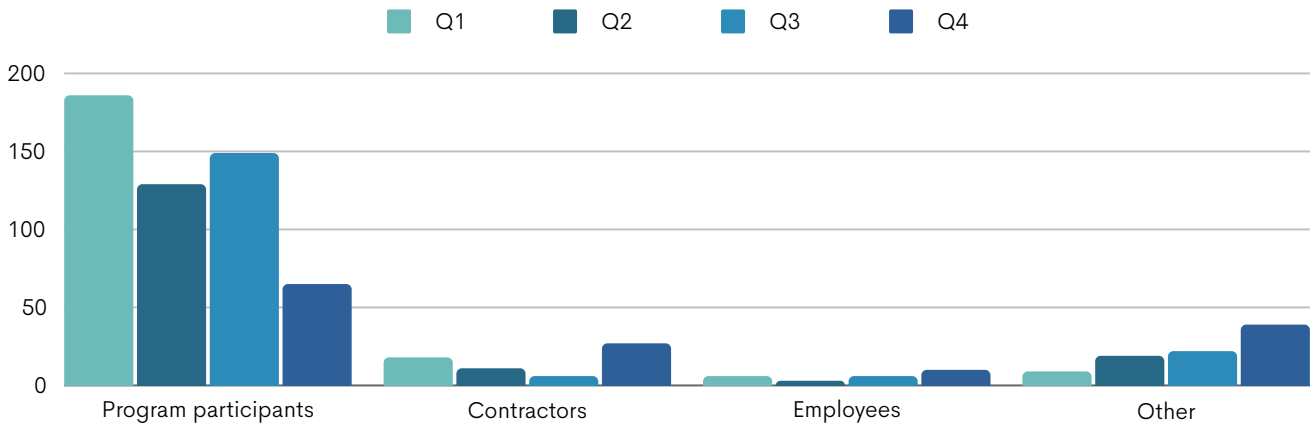
**Total Complaints by Quarter**



### Complaints by Disposition

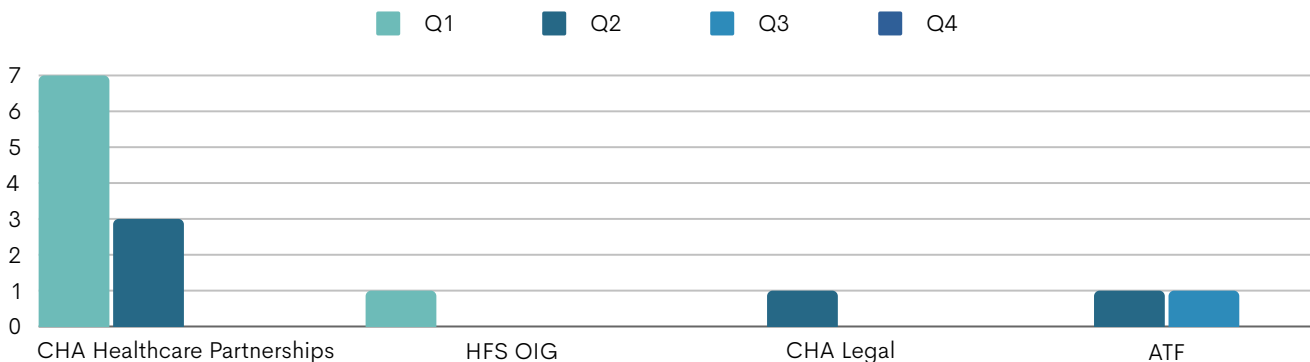


### Subjects of Complaints



### Investigative Support

The OIG regularly receives requests from various external and internal partners for investigative support on matters within the OIG's jurisdiction. These requests often take the form of requests for information, due diligence, or data analysis. In the fourth quarter of 2023, the OIG did not receive any requests for investigative support.





# Investigations

An OIG investigation may be administrative, criminal, or both. Administrative investigations generally involve violations of HUD regulations and/or CHA rules, policies, or procedures. An administrative case is sustained if the preponderance of the evidence establishes a violation or the case identifies a particular issue that warrants an advisory to CHA management. For sustained administrative investigations, the OIG produces either an advisory or summary report of investigation with findings and recommendations for appropriate disciplinary, administrative, or other action to the CEO and the impacted department. The OIG will report management's response in each quarterly report.

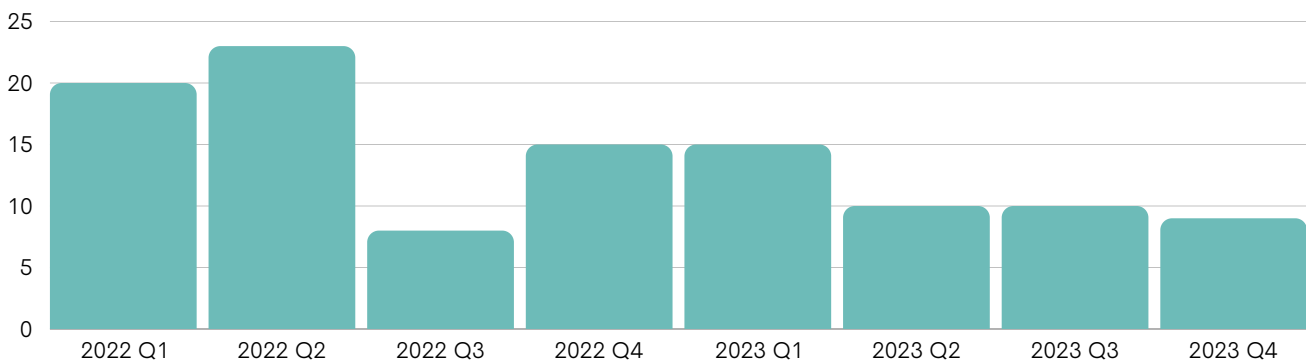
In criminal investigations, if there is sufficient evidence for potential prosecution, the OIG presents the evidence to a prosecuting agency for review. Investigations that result in criminal charges are reported to CHA management and the Finance and Audit Committee. A criminal matter that results in a final criminal conviction is closed sustained.

A case is not sustained when the OIG concludes that the available evidence is insufficient to prove a violation under applicable burdens of proof. A case is closed with no further action warranted ("closed -NFA") when, in OIG's assessment, the matter has been or is being appropriately addressed by another agency or department, the matter was consolidated with another investigation, or, the OIG determines that no further investigative action is warranted based on the specific circumstances presented.

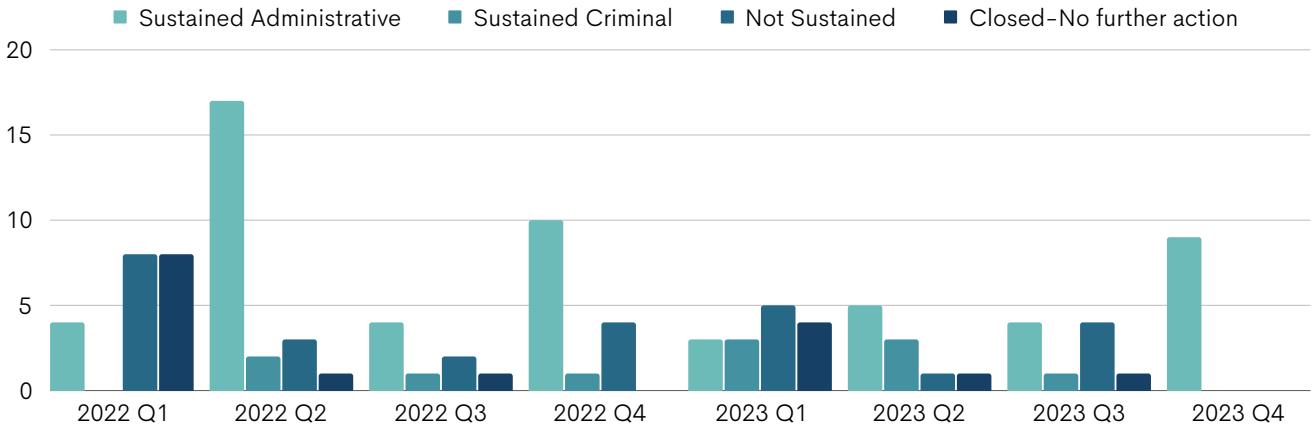
## Investigations Closed During the Quarter

In the fourth quarter of 2023, the OIG closed **9** investigations; all were closed sustained. Of the 9 sustained cases, **8** were sustained for administrative violations, and **1** was sustained with a criminal conviction.

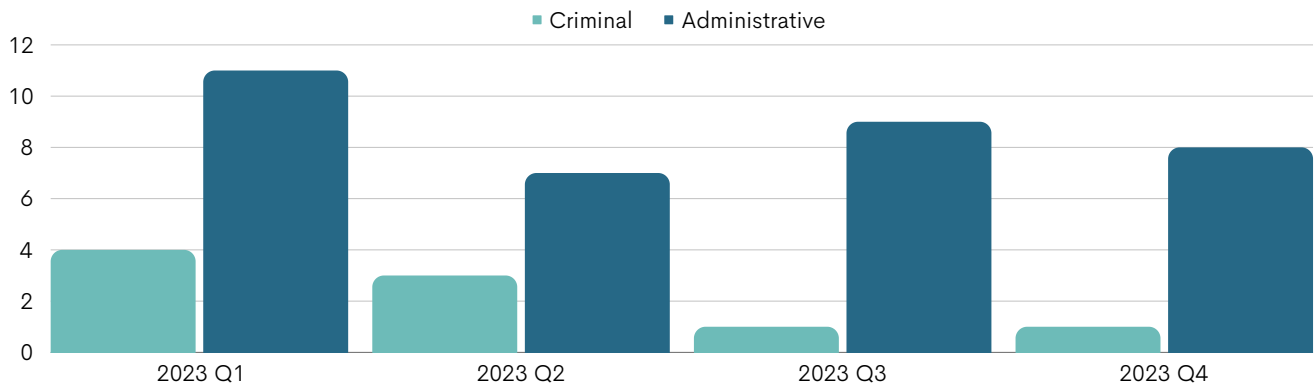
## Closed Investigations by Quarter



### Disposition of Closed Investigations

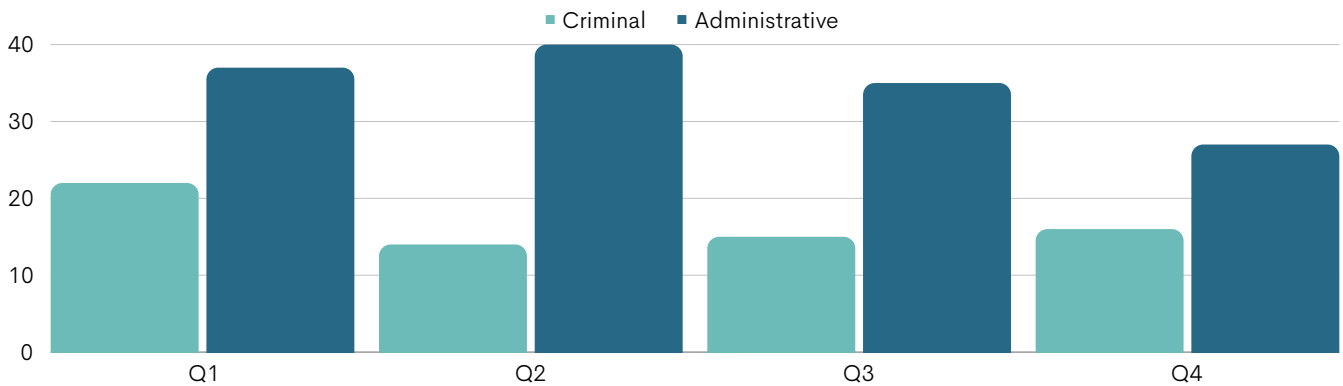


### Closed Criminal and Administrative Cases



### Pending Criminal and Administrative Investigations

At the close of the fourth quarter, the OIG had **43** pending investigations, including **27** administrative and **16** criminal investigations.



## Investigations Not Concluded Within Six Months

Under the Office of the Inspector General Charter, the OIG must provide statistical data on pending investigations/matters open for more than six months. Of the **43** open investigations, **37** have been open for at least six months. The following table shows the reasons why these matters remain open.

Reasons	Number of Investigations
Complex investigations, generally involve difficult issues of multiple subjects and/or under review by prosecuting agency	23
Indicted cases, but no criminal disposition	3
On-hold or delayed due to other ongoing time-sensitive investigations	11
Total	37



## Criminal Case Recoveries

This quarter, the OIG secured one new order of restitution of **\$83,103.59**. The total restitution ordered to the CHA as a result of OIG cases in 2023 was **\$841,848.91**.

The OIG received actual funds from three defendants this quarter. The OIG works in collaboration with the CHA's Office of General Counsel to ensure restitution orders are enforced.

Case Name	Date of Restitution Order	Amount
People v. Townsend 22-CR-0017401 (Cook Cty Cir. Ct.)	1/12/23	\$106,634.00
People v. Carney 21-CR-1492801 (Cook Cty Cir Ct.)	3/31/23	\$9,186.00
<b>Q1 Total Ordered</b>		<b>\$115,820.00</b>

Case Name	Date of Restitution Order	Amount
U.S. v. Jones, 22 CR 612, (N.D. Ill.)	4/27/23	\$29,644.00
U.S. v. Coleman, 20-CR-99 (N.D. Ill.)	5/25/23	\$389,779.00
U.S. v. Green, 22-CR-391 (N.D. Ill.)	6/7/23	\$150,502.32
<b>Q2 Total Ordered</b>		<b>\$569,925.32</b>

Case Name	Date of Restitution Order	Amount
People v. Hawthorne, HCVP #9708719; (Cook Cty. Cir. Ct.)	8/30/23	\$73,000.00
<b>Q3 Total Ordered</b>		<b>\$73,000.00</b>

Case Name	Date of Restitution Order	Amount
People v. Spruill 22 CR 0228801 (Cook Cty. Cir. Ct.)	11/30/23	\$83,103.59
<b>Q4 Total Ordered</b>		<b>\$83,103.59</b>
<b>2023 YTD Total</b>		<b>\$841,848.91</b>

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The following charts show actual funds received by convicted defendants by quarter.

Case Name	Date of Restitution Payment	Amount
People v. Hawthorne, HCVP #9708719; (Cook Cty. Cir. Ct.)	3/14/23	\$500.00
People v. Wanda Goodloe 16-CR-0628801, (Cook Cty. Cir. Ct.)	3/13/23	\$200.00
<b>Q1 Total Received</b>		<b>\$700.00</b>

Case Name	Date of Restitution Payment	Amount
People v. Watts and Spivery	4/14/23	\$4,833.00
People v. Townsend 22-CR-0017401 (Cook Cty Cir. Ct.)	05/22/23	\$20,000.00
People v. Hawthorne, HCVP #9708719; (Cook Cty. Cir. Ct.)	5/16/23	\$500.00
<b>Q2 Total Received</b>		<b>\$25,333.00</b>

Case Name	Date of Restitution Payment	Amount
People v. Townsend 22-CR-0017401 (Cook Cty Cir. Ct.)	07/13/23	\$500.00
People v. Hawthorne, HCVP #9708719; (Cook Cty. Cir. Ct.)	09/3/2023	\$500.00
<b>Q3 Total Received</b>		<b>\$1,000.00</b>

Case Name	Date of Restitution Payment	Amount
People v. Spruill, 22-CR-0228801	12/13/23	\$15,000.00
People v. Wanda Goodloe 22-CR-0017401 (Cook Cty Cir. Ct.)	12/13/23	\$70.00
People v. Hawthorne, HCVP #9708719; (Cook Cty. Cir. Ct.)	12/20/2023	\$500.00
<b>Q4 Total Received</b>		<b>\$15,570.00</b>
<b>2023 YTD Total</b>		<b>\$42,603.00</b>

## Criminal Cases

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This quarter, OIG investigations resulted in one guilty plea and sentencing. All charged criminal case activities are summarized below.

### Criminal Indictments

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This quarter OIG investigations resulted in no new indictments.

### Criminal Case Updates and Sentencings

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#### **People v. Spruill, 22-CR-0228801**

#### **Guilty Plea & Sentencing, Former Private Property Management Employee**

#### **OIG #2020-02-00030**

On November 30, 2023, Nekeia Spruill, a former property manager for Leasing & Management, Inc. (L & M), who worked at two CHA mixed-income properties, pleaded guilty in the Circuit Court of Cook County to one count of Theft of Government Funds relative to her scheme to defraud the CHA by depositing over \$83,000 in tenant rent payments to her own accounts. Spruill was sentenced to 24 months' probation and ordered to pay restitution to the CHA in the amount of \$83,103.59, including \$15,000, which Spruill tendered in court at sentencing.

Spruill had previously been charged in a nine-count indictment for theft, forgery, and wire fraud in connection with her management of Keystone Place Apartments and Dorchester Housing + Art Collaborative from February 2017 through October 2019. During that time, Spruill altered over \$83,000 in money orders used by tenants to pay rent, by changing the payee to herself. Spruill then fraudulently deposited the money orders into her personal bank accounts. The rent payments were from tenants at that the two properties, including CHA public housing residents, CHA Housing Choice Voucher (HCV) participants, and market rate renters. L & M worked closely with the OIG to support the investigation and ensure no tenants were negatively affected.

The CHA OIG worked the investigation jointly with the Chicago Police Department Financial Crimes Unit. Prosecution was handled by the Illinois Attorney General's Office, Public Integrity Bureau. The OIG's investigation is now closed.

### OIG Criminal Cases Pending in Court

At the end of Q4 2023, the OIG had **4** criminal cases pending in court. Two of those cases stem from one OIG investigation.

Case Name	Indictment	Summary of Charges	Scheme	Updates
People v. Brown 22 CR 0281301 (Cook Cty. Cir. Ct.)	3/2/2022	Class X felony theft and forgery	HCV Fraud	On October 11, 2023, a guilty plea was entered in court by agreement. The hearing was continued to January 29, 2024.
People v. Rios 22 CR 0694301 (Cook Cty. Cir. Ct.)	6/15/2022	State benefits fraud, multiple forgery counts	HCV Fraud	Status hearing set for February 8, 2024.
People v. Rodriguez 22 CR 0694401 (Cook Cty. Cir. Ct.)	6/15/2022	Class 1 felony theft, forgery	HCV Fraud	Status hearing set for February 21, 2024.
People v. Robins 23 CR 0619301 (Cook Cty. Cir. Ct.)	6/7/2023	Class X felony theft	HCV Fraud	Status hearing set for February 28, 2024.



# Sustained Administrative Case Summaries

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The following summaries provide information regarding sustained administrative investigations and any management response received within 30 days of the matter's closing.

## **CHA Employee Misappropriated Ventra Cards and Made False Statements in Official OIG Investigation** **OIG #2023-0613**

A recent OIG investigation found that a CHA Resident Services employee misappropriated seven CHA-owned Ventra Cards, intended for use by CHA program participants. While the individual did not use the CHA Ventra cards, they falsely represented the cards as their own to obtain new, un-expired cards. The employee subsequently made multiple false statements during the OIG's investigation of the matter. Accordingly, the OIG recommended that CHA terminate the individual's employment. In response, the CHA terminated the individual.

## **Public Housing Resident Found to be Proprietor of Bed & Breakfast in Mexico** **OIG SRI #2023-01-00035**

An OIG investigation found that a current Public Housing resident living at a CHA Senior building failed to disclose their income and ownership of a five-room bed and breakfast in Mexico. The resident further abandoned their CHA unit for long stretches of time—including two years and four months from 2019 to 2021—while living and working in Mexico, operating the B&B. Accordingly, the OIG recommended that the PAM department take immediate steps to terminate the individual's lease and end their participation in the program.

In response, PAM agreed with the OIG's recommendation and referred the matter to CHA's Office of the General Counsel to start the eviction process.



**Mother and Daughter Voucher Holders Each Failed to Disclose Business Income and Receipt of Combined Total of \$142,000 in PPP Loans**  
**OIG SRI #2022-11-00018**

An OIG investigation found that two HCV participants, a mother and daughter who are each voucher holders, knowingly violated program rules by failing to disclose business income from multiple businesses and for obtaining over \$142,000 in PPP loans, combined. One of the participants also failed to disclose that she had a husband, who resided with her as an unauthorized occupant. The OIG noted that program enforcement for both participants had already been initiated, and recommended that the HCV department review the additional information for any further administrative enforcement action, as appropriate.

The HCV department responded that the daughter had not requested a hearing to contest termination of the voucher and her participation had ended. The mother's informal hearing on her continued participation remained pending as of January 9, 2024.

**Property Manager Failed to Secure Access to Public Housing Storage Facility, Leading to Theft of Six New Furnaces**  
**OIG #2022-10-00014**

An OIG investigation of the theft of at least six furnaces and other materials from a public housing scattered site storage unit found that a former supervisor with the assigned Private Property Management (PPM) company failed to properly secure and restrict access to the storage unit keys. As a result, in October 2022, items worth a total of approximately \$17,000 or more, were stolen from the scattered site property. In response to the theft, the PPM terminated the supervisor, however the individual was later hired by another CHA PPM firm and assigned to manage another scattered site. While the evidence suggests that a PPM employee participated in the theft, the supervisor's lack of control over the keys and lack of security and anti-theft measures at the scattered site storage facilities meant there was little direct evidence of who committed the theft.

The OIG recommended CHA review these findings with the PPM and seek reimbursement for the costs of the stolen items. Second, the OIG recommended CHA provide the report of investigation to the individual's current PPM employer and ask the PPM to take any action necessary to ensure such lapses do not occur on CHA property again. Finally, the OIG recommended CHA and current PPMs implement additional inventory controls and anti-theft measures at the scattered sites.

In response, PAM met with both PPMs. The first PPM responsible for scattered site storage in October 2022 reported that it had reinforced with its staff the importance of following established inventory control procedures. The PPM agreed to reimburse the CHA \$13,324.74 for 6 furnaces, 2 snow blowers, and 20 shovels that were stolen.

The second PPM, now responsible for scattered site storage, no longer uses 8 of the previous locations for storage. Of the four remaining offsite locations, three are for unusable appliances pending disposition, and one is used to store doors. The PPM reported that they have an appliance log, and the Property Supervisor verifies inventory weekly. The PPM provided a list of personnel who provide access to the storage room.

**HCV Participant Relocated to Home They Purchased in Mississippi and Allowed Others to Live in their CHA-Subsidized Unit, OIG #2021-10-00035**

An OIG investigation found that, for more than three years, a current HCV participant had been living in a house they own in Flowood, Mississippi. The participant, with the knowledge of the HCV landlord, had allowed their sister and a family friend to reside in the subsidized unit. Additionally, the participant had failed to report business income and receipt of a Paycheck Protection Program loan. OIG recommended that the HCV department terminate the individual's participation in the program.

In response, HCV issued the participant a notice of Intent to Terminate on the following bases: the subsidized unit was not the participant's only residence, the family was absent from the subsidized unit for an extended period, unauthorized occupants were living in the subsidized unit, unreported business income, and non-compliance with program administration.

HCV further referred the matter to CHA Legal to determine whether to pursue enforcement against the owner of the subsidized unit as well.

**HCV Participant Rented from Her Daughters for More Than 20 Years, OIG SRI #2021-08-00037**

A recent OIG Investigation found that an HCV participant had been renting from relatives at a property owned by her daughters since her entrance to the program in 1999. The OIG recommended that the HCV department review the matter for administrative action as appropriate.

In response, the HCV department issued the participant a notice of Intent to Terminate for renting from a relative and non-compliance with HCV requests for information regarding the familial relationship. Owner enforcement action is pending.

# Audits and Reviews

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## Closed Audits

The OIG closed one audit in the fourth quarter of 2023. The OIG's Audit of CHA's Implementation of Procurement Reform Task Force (PRTF) Recommendations Part II is summarized below.

## Draft Audits

The OIG issued a draft Audit of Mixed Finance/Mixed Income Property Rent Collection and is awaiting management's response. The audit is expected to be closed next quarter.

## Pending Audits

The OIG had two audits pending at the close of the fourth quarter. The Contractors System Access Audit and CHA's Public Housing Equipment Appliance and Materials Inventory Follow-up Audit are expected to be finalized in Q1 2024.

The OIG appreciates CHA management for their willingness to engage in the audit process and continue to improve CHA programs.

## **Audit of CHA's Implementation of the Procurement Reform Task Force (PRTF) Recommendations Part II**

On October 20, 2023, the OIG issued a performance audit of the CHA's progress in implementing the recommendations of the Chicago Procurement Reform Task Force (PRTF) and the CHA OIG. The CHA OIG reviewed 9 procurement reform recommendations: PRTF recommendation numbers 4, 14, 15, 18, 21, 22, and 25, that had not been implemented by CHA as of the 2019 City of Chicago OIG assessment, and 2 additional recommendations (referred to below as #8(OIG) and #9(OIG)) that OIG provided to CHA management following its first PRTF audit in 2019. The OIG commends CHA for implementing the two OIG recommendations regarding contractor disclosures as well as the other numerous improvements made through its work with the PRTF.

The full audit report may be located on the OIG's website:

[Audit of CHA's Implementation of PRTF Recommendations Part II](#)

## Summary of Findings

1. CHA partially implemented 3 PRTF Recommendations and did not implement 4 PRTF Recommendations.
  - a. With respect to the recommendations not implemented, the CHA Department of Contracts and Procurement (DPC) noted that in some instances there was a deliberate decision to not implement recommendations, and in others, the CHA's implementation was prevented by other agencies' inaction.
2. CHA implemented both OIG recommendations regarding Economic Disclosure Statements (EDS) but did not require new or amended disclosures following contract amendments or changes in subcontractors.
3. CHA has not shared its debarment list with its Sister agencies.
4. CHA did not have a uniform electronic system to store supporting contract documents, including EDS.

## Summary of Recommendations

The OIG recommended that CHA take the following actions:

1. Require an updated EDS for any new subcontractor and or key employee assigned to an existing contract over \$250,000; and to contracts that have change orders totaling over the \$250,000.
2. CHA should publicly post its list of debarred vendors on its website and separately maintain and share with its Sister Agencies, a Vendor Performance Spreadsheet for use when making contracting decisions. Conversely, CHA must ensure it regularly obtains debarment and performance information from all other Sister Agencies.
3. CHA DPC should ensure all DPC staff maintain a uniform electronic storage system to store supporting contract documents, including the EDS forms, and conduct periodic file reviews to ensure files are complete.

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1 The PRTF 2020 Q2 Progress Report may be accessed here: [2Q2020 Status Report of the Chicago Procurement Reform Task Force - October 2020](#).

2 The CHA OIG's 2019 PRTF Audit report may be accessed here: [CHA OIG 2019 Procurement Reform Task Force Audit](#).

## Summary of Management's Response

**Finding 2** - Management concurred with finding and recommendation.

Management stated, "DPC will implement the addition of an updated EDS for any change orders or structural changes in the organization per notice from the vendor."

**Finding 3** - Management concurred with part of the findings and recommendations.

Management stated, "We concur with part of the findings. DPC will publish the current debarment/suspension list on the website. We do not have a mechanism to share information with the Sister agencies. As information inquiries are requested from sister agencies, CHA DPC will respond."

**Finding 4** - Management concurred with part of the findings and recommendations.

Management stated, "We concur with part of the findings as the files are within the Sourcing System and Project files. We will take under consideration an electronic storage system for the EDS and other vendor documentation during the new ERP system under vendor database management

## OIG Management Advisories and Memos

This quarter, the OIG issued no management memos or advisories.





The Office of the Inspector General (OIG) is an independent body within the Chicago Housing Authority (CHA). Its purpose is to investigate and audit matters concerning fraud, theft, waste, abuse, and misconduct within or affecting CHA. The OIG promotes economy, efficiency, and integrity in the administration of programs and operations of CHA. The OIG ensures that violations are investigated and prosecuted, as they relate to CHA residents and employees, contractors, subcontractors, or any entity receiving funds from CHA.

For more information regarding this report, please contact  
Chicago Housing Authority  
Office of the Inspector General  
60 E. Van Buren St. 7th Floor  
Chicago, IL 60605

Or visit our website at [www.thecha.org/fraud](http://www.thecha.org/fraud)

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