CITY OF LAS VEGAS
PUBLIC HOUSING AUTHORITY BOARD MEETING AGENDA
JANUARY 15, 2020 –WEDNESDAY– 5:30 P.M.
City Council Chambers
1700 North Grand Avenue

(The City Council is the Housing Authority Board of Commissioner on any matters concerning the Housing Department.)

I. **CALL TO ORDER**

II. **ROLL CALL**

III. **PLEDGE OF ALLEGIANCE**

IV. **MOMENT OF SILENCE**

V. **APPROVAL OF AGENDA**

VI. **APPROVAL OF MINUTES**
Approval/Disapproval of minutes of the Meetings on December 18, 2019.

VII. **PUBLIC INPUT ** (not to exceed 3 minutes per person and persons must sign up at least fifteen (15) minutes prior to meeting)**

VIII. **PRESENTATION ** (not to exceed 10 minutes per person)**

1. Housing Authority Finance Report – Financial Specialist
2. HUD Assessment Report

IX. **HOUSING DIRECTOR'S MONTHLY REPORT**

X. **COMMISSIONER'S REPORT**

XI. **EXECUTIVE SESSION/CLOSED SESSION**

THE HOUSING AUTHORITY BOARD OF COMMISSIONERS MAY CONVENE INTO EXECUTIVE SESSION IF SUBJECT MATTER OF ISSUES ARE EXEMPT FROM THE OPEN MEETINGS REQUIREMENT UNDER §(H) OF THE OPEN MEETINGS ACT.

i. **Personnel matters, as permitted by Section 10-15-1(H) (2) of the New Mexico Open Meetings Act, NMSA 1978.**

ii. **Matters subject to the attorney client privilege pertaining to threatened or pending litigation in which the City of Las Vegas is or may become a participant, as permitted by Section 10-15-1(H) (7) of the New Mexico Open Meetings Act, NMSA 1978.**

iii. **Matters pertaining to the discussion of the sale and acquisition of real property, as permitted by Section 10-15-1(H) (8) of the Open Meetings Act, NMSA 1978.**

XII. ADJOURN

ATTENTION PERSONS WITH DISABILITIES: The meeting room and facilities are accessible to persons with mobility disabilities. If you plan to attend the meeting and will need an auxiliary aid or service, please contact the City Clerk's Office prior to the meeting so that arrangements may be made.

NOTE: A final Agenda will be posted 72 hours prior to the meeting. Copies of the Agenda may be obtained from City Hall, Office of the City Clerk, 1700 North Grand Avenue, Las Vegas, New Mexico 87701.

MINUTES OF THE CITY OF LAS VEGAS HOUSING AUTHORITY COMMISSION MEETING HELD ON WEDNESDAY DECEMBER 18, 2019 AT 5:30 P.M. IN THE CITY COUNCIL CHAMBERS.

MADAM CHAIR: Tonita Gurulé-Girón

COMMISSIONERS: Ember Davis
David Romero
Vince Howell
Barbara Casey
David Ulibarri Jr.

ALSO PRESENT:
Esther Garduño-Montoya, City Attorney
Barbara Padilla, Interim Housing Director
Natasha Martinez-Padilla, Finance Specialist

CALL TO ORDER
Meeting was called to order by Madam Chair Tonita Gurulé-Girón.
ROLL CALL

PLEDGE OF ALLEGIANCE

MOMENT OF SILENCE
Madam Chair Tonita Gurulé-Girón asked Commissioner David Romero to offer the moment of silence. Commissioner Romero offered a moment of silence for all those in the community that have passed in the past month. Also for those families that won't be having their loved ones with them this holiday season, and they make the right decisions as they go about their business tonight.

APPROVAL OF AGENDA
Commissioner Barbara Casey made a motion to approve the agenda as presented. Commissioner David Ulibarri seconded the motion.

Madam Chair Gurulé-Girón asked for a roll call. Roll call was taken and reflected the following.

Commissioner Ember Davis	Yes	Commissioner David Romero	Yes
Commissioner Barbara Casey	Yes	Commissioner David Ulibarri Jr.	Yes
Commissioner Vince Howell	Yes		

Barbara Padilla re-read the motion and advised the motion carried.

APPROVAL MINUTES
Commissioner Barbara Casey made a motion to approve the minutes of December 18, 2019. Commissioner David Ulibarri seconded the motion.

Madam Chair Gurulé-Girón asked for a roll call. Roll call was taken and reflected the following.

Commissioner David Romero	Yes	Commissioner David Ulibarri	Yes
Commissioner Ember Davis	Yes	Commissioner Barbara Casey	Yes
Commissioner Vince Howell	Yes		

Barbara Padilla re-read the motion and advised the motion carried.

PUBLIC INPUT
None at this time.

PRESENTATION

HOUSING AUTHORITY FINANCE REPORT
Natasha Martinez, Financial Specialist presented the Housing Authority's Revenue and Expenditure report for the month ending November 30, 2019. Ms. Martinez stated for revenues, dwelling rent is still lower year to date. She said as she has stated in previous meetings they are working toward filling the vacancies. Ms. Martinez said once they get more families into the units it will help the Dwelling rents go up. For the accrual for Operating Subsidy, they are over, at $321,992. She stated they had budgeted $275,000 year to date. Ms. Martinez stated that Other Income is mostly for windows and late fees. She stated the General Fund Transfer should be coming in now in December. Ms. Martinez stated she has not heard anything about a continuing resolution being signed just yet, so she knows there is a budget all the way through Friday, but after that she does not think the Federal Government has a budget in place just yet. She stated hopefully they will get that transfer in by Friday. For Employee Expenses, they are at 42%, reason being, they did have three pay rolls in the month of November, so it will always be a little bit over there. Ms. Martinez stated they do stay frugal in Operations but it is always a little lower because they have that money set aside for projects, to get units turned around once they can accumulate enough money to do so.

HOUSING DIRECTORS MONTHLY REPORT
Interim Director Barbara Padilla reported on unit maintenance, Housing Staff prepared 7 units for move-in in the month of November. There were 9 move-outs in November. Maintenance continues to work on unit turnarounds and works on emergency furnace and plumbing issues as they occur. Interim Director Padilla stated the unit some of the commissioners went out to see on Yucca Street was recently completed and a family has already been called to accept that unit.

Interim Director Padilla stated the Waiting List Manager continues to accept and process applications daily. She stated as of December 10th, there were 80 applicants on the waiting list. Of those there were 57 on the 0-1 bedroom waiting list, 13 on the 2 bedroom waiting list, 7 on the 3 bedroom waiting list, 3 on the 4 bedroom waiting list and are currently zero people on the 5 bedroom waiting list. She stated that Housing will be going on the radio on Friday to advertise for applicants as well as to give out any other information as needed.

Interim Director Padilla reported that the Housing Managers recertified 16 families for lease renewal. She stated they do this every month. It's an average of 15 to 20 recertifications each month that they do. The Housing Managers also completed 7 move-in orientations, while continuing with the lease enforcement, lease renewal, annual and special inspections and other day to day operations.

Interim Director Padilla stated that Housing Staff members attended a free evening seminar at the Albuquerque Housing Authority on Tenant Landlord Law, which was very informative. She stated the seminars are also open to the public for anyone who is interested. She stated that the seminars are done every six months, and if anyone is interested, she can get further information on the next seminar.

Interim Director Padilla stated Housing Staff continues to attend monthly safety meetings provided by the HR Risk Management, and they are still offering the Smoke Free Cessation classes to the residents of Public Housing.

Interim Director Padilla stated that currently they have the 5 unit Di Minimus Project, which will be presented at tonight's meeting for approval to award for the demolition of the project. She stated they also have cabinet replacement ongoing, with 5 sets of cabinets scheduled to be replaced. Interim Director Padilla stated the HA has already procured new fencing on Sagebrush, Delgado and Hot Springs areas. She stated the work will begin, weather permitting. The sidewalk project throughout housing has also been procured and will begin weather permitting as well as the stucco project at 2802 Louden #9 and #10. Interim Director Padilla stated that furnace replacement occurs as needed.

BUSINESS ITEMS

ITEM#1

Approval/Disapproval to award Bid No. 2020-05 City of Las Vegas Housing Authority 5 Unit Demolition to Rocky Road Gravel, the lowest responsive bidder.

Natasha Martinez stated that the City of Las Vegas Housing Authority has submitted and been approved for a 5 Unit DeMinimus. This project will help the housing authority's vacancy score as well as assist the beautification of the Sagebrush site. Ms. Martinez stated the commissioners have been provided with the bid documents from AGM Construction, Rocky Road Gravels, Sanchez Demolition, Earth Tech, and Hay's Plumbing. She stated that Rocky Road Gravels was their lowest responsive bid. She explained that they did the sealed bid process. She stated as they have been talking about for the last 2 or three years, what they will be doing, is getting the three structures, 5 units, taken down so they can help the vacancy rating. She stated these units are the ones that were considered beyond repair. She stated that by doing the 5 unit DeMinimus Project, they can take down the units and put them back up at their own leisure, or they can have the necessary meetings to see what the residents would like to be placed there, such as a basketball court, garden area or such.

Commissioner David Romero stated, going to the bid sheet, some of the bids only show a couple of the units. Ms. Martinez stated there are three structures, 5 units.

Commissioner Barbara Casey made a motion for approval to award Bid No. 2020-05 City of Las Vegas Housing Authority 5 Unit Demolition to Rock Road Gravel, the lowest responsive bidder. Commissioner David Romero seconded the motion.

Madam Chair Gurulé-Girón asked for a roll call. Roll call was taken and reflected the following.

Commissioner Vince Howell	Yes	Commissioner Barbara Casey	Yes
Commissioner Ember Davis	Yes	Commissioner David Ulibarri Jr.	Yes
Commissioner David Romero	Yes		

Barbara Padilla re-read the motion and advised the motion carried.

COMMISSIONERS REPORT

Commissioner Barbara Casey stated she was approached by a citizen asking why houses were being advertised for sale when they aren't really for sale. Commissioner Casey stated the woman told her she had been looking for affordable housing to rent to other people and she contacted a realtor in Santa Fe and another one in Albuquerque. She stated both realtors told her there were houses on Cholla and on Yucca that were up for sale for $44,000 each. Commissioner Casey stated the woman put down earnest money to buy those houses and when she went to the title company she was told, no, those houses are not for sale, and they did not know why they were being advertised.

Madam Chair Gurulé-Girón asked, who is advertising them. Commissioner Casey stated the woman said that she had read one advertisement in the Albuquerque Journal, she didn't say anything about the Santa Fe one, other than that the realtor she had contacted told her those houses were available here in Las Vegas.

Interim Director Padilla asked if Commissioner Casey got addresses by chance. Commissioner Casey stated no, she was just told they were on Cholla and Yucca streets. Interim Director Padilla stated they will look into the matter. She stated those units are part of the Homeownership program and due to possible litigation, whey will need to speak to the City Attorney about it. Commissioner Casey stated she told the woman that she was sure it was an error. She said the woman was very upset because she lost her earnest money. Commissioner Casey told the woman the earnest money should be returned to her. Commissioner Casey stated she thought something had happened between last month and this month that had not been apprised of. Madam Chair Gurulé-Girón asked Housing to follow up on this.

Commissioner Howell asked if they had any more status update on their visit from the Federal HUD visitors. Interim Director Padilla stated they have not received an update at all. Commissioner Howell stated it has been almost a year now. Interim Director Padilla stated that answer will come from the City, not the Housing Authority, since that is who the response should go to. She stated she does not know if the City has had a response. Madam Chair Gurulé-Girón stated that Ann Marie (Interim City Manager) would have known, and they have not. Interim City Manager, Ann Marie Gallegos answered, no they have not. Commissioner Howell asked the Interim City Manager if they are following up with them to see what the reason is for not having any information. Interim City Manager stated the only thing she can inform them of is that the auditors have been in contact with them and she is not sure what the discussion has been, she stated it did have something to do with the audit and the homes they needed to repay HUD for, but that was the only discussion that she knows of and the auditors have contacted HUD as well. Commissioner Howell asked, in DC? Interim City Manager stated, in Albuquerque. Commissioner Howell said he is talking about the visitors from DC. Madam Chair Gurulé-Girón said it is regional, it could be out of Texas, but they haven't heard anything. Interim City Manager Gallegos said she has not had any discussions or correspondence from them.

Commissioner David Ulibarri Jr. asked if Housing has heard anything about the survey for the wall on Hot Springs. He said he received a report that they are still working on it, but it has been three or four months. Interim Director Padilla stated that was the last update that they also received, but they will follow up again. She stated they have been calling weekly and have not been successful in reaching the surveyor.

Commissioner David Romero asked who is doing the survey. Interim Director Padilla stated that Ted Winston is the only surveyor that responded.

Commissioner David Ulibarri said he does not know if the other commissioners have seen that wall by Daylight Donuts, it is almost to fall down. He said he has been trying to get some help to see if it is on City property or the owner's property. He stated the surveyors have taken a while to do what they have to do and the owners are concerned about the wall falling and someone getting hurt.

Commissioner David Ulibarri asked if there is a timeline that the surveyor has to do this or are we basically at his mercy. City Attorney, Ester Garduno-Montoya stated she is not sure if there was a contract or any kind of terms. Commissioner David Romero asked if he was paid up front, or how is that determined. Natasha Martinez stated no, they do not pay until after the survey is done.

EXECUTIVE SESSION

None

ADJOURN

Commissioner Barbara Casey made a motion to adjourn the meeting. Commissioner Vince Howell seconded the motion.

Madam Chair Gurulé-Girón asked for a roll call. Roll call was taken and reflected the following.

Commissioner Barbara Casey	Yes	Commissioner Vince Howell	Yes
Commissioner Ember Davis	Yes	Commissioner David Ulibarri Jr.	Yes
Commissioner David Romero	Yes		

Barbara Padilla re-read the motion and advised the motion carried.

____
Chairman of the Board of Commissioners

ATTEST

____
Casandra Fresquez, City Clerk

HOUSING DEPARTMENT-REVENUE COMPARISON
THRU December 31, 2019- 50% OF YEAR LAPSED (6 of 12 months)
FISCAL YEAR 2020

	A	B	C	D	E	G
	FY 2019 BUDGET	FY 2020 BUDGET	FY 2020 YTD - BUDGET	FY 2019 ACTUAL	FY 2020 YTD - ACTUAL	(E/B) % REV
DWELLING RENT	540,000	560,000	280,000	568,509	259,827	46%
OPERATING SUBSIDY	640,000	660,000	330,000	738,304	379,860	58%
HOUSING-OTHER INCOME	13,450	16,400	8,200	16,501	10,512	64%
TRANSFERS IN (CFP FUNDS)	193,775	124,386	62,193	193,775	7,497	6%
TOTAL	1,387,225	1,360,786	680,393	1,517,089	657,696	48%

(Other income includes:interest, late fee charges and unit repair materials)

HOUSING DEPARTMENT- EXPENDITURE COMPARISON
THRU December 31, 2019- 50% OF YEAR LAPSED (6 of 12 months)
FISCAL YEAR 2020

	A	B	C	D	E	F	H
	FY 2019 BUDGET	FY 2020 BUDGET	FY 2020 YTD - BUDGET	FY 2019 ACTUAL	FY 2020 YTD - ACTUAL	FY 2017 AVAIL. BAL.	(E/B) % BDGT
EMPLOYEE EXP.	651,002	662,577	331,289	605,556	320,800	341,777	48%
OPERATING EXP.	692,881	838,795	419,398	511,916	228,456	610,339	27%
TOTAL	1,343,883	1,501,372	750,686	1,117,472	549,256	952,116	37%

U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
NEW MEXICO STATE OFFICE
500 Gold Ave SW, Suite 7301 PO Box 906
Albuquerque, New Mexico 87103-0906

OFFICE OF PUBLIC HOUSING

DIRECT DIAL 505-346-7303
FACSIMILE 505-346-6604

JAN 0 7 2020

Honorable Vince Howell, Mayor Pro Tem
City of Las Vegas
1700 North Grand Avenue
Las Vegas, New Mexico 87701

Ann Marie Gallegos
Interim City Manager
1700 North Grand Avenue
Las Vegas, New Mexico 87701

SUBJECT: Additional liability in the amount of $3,808,000.00 to be paid back to HUD

Dear Mayor Pro Tem Howell and Interim City Manager Gallegos:

Pursuant to my delegated authority, I have determined that the Housing Authority of the City of Las Vegas, New Mexico (CLVHA), a department of the City of Las Vegas (City), has misused federal funds and is required to pay back the amount of $3,808,000.00 to HUD with non-federal funds, in addition to any amount remaining in the existing repayment agreement between HUD and the City.

This liability is based on the following:

i. HUD's Quality Assurance Subsystem (QASS) in a 2018 report titled "Operational Assessment of the Housing Authority of the City of Las Vegas" reviewed the findings of the HUD's Albuquerque Field Office and the private consult Moss Adams and summarized the compliance failures of the City and CLVHA. QASS's report details the sale of 17 properties covered by the ACC to ineligible buyers in violation of HUD requirements.

ii. On October 10, 2002, HUD's Special Application Center (SAC) approved CLVHA's request to operate a homeownership program under §5(h) of the United States Housing Act of 1937 and dispose of up to 60 housing units to eligible buyers. HUD's approval limited eligible buyers to: 1) the resident of the unit, 2) another public housing resident or 3) another low income family in the jurisdiction. The City and CLVHA chose to dispose of 17 housing units to ineligible buyers, including another housing authority and persons who were neither public housing residents nor low-income.

iii. The City and CLVHA realized net proceeds from the sale of 17 properties under ACC in the amount of $636,953.00. As demonstrated in HUD's Operational Assessment (2019) and the report of Moss Adams (October 5, 2012), the City did not conform to the depository and use requirements of the proceeds of sale. The City expended these restricted funds for ineligible costs which included the purchase of a property located at 2513 Hot Springs Blvd, Las Vegas, NM (Church property) for $150,656, travel and training expenses of $23,482, improperly procured contracts totaling $353,483, and other ineligible activities in the amount of $106,943.

iv. HUD reduced the debt owed by certain reimbursements, and the City acknowledged the ineligible costs by entering into a repayment agreement with HUD on February 16, 2016, which required the repayment of $460,426.00. The terms of the repayment agreement required the City to pay $30,000 in cash and in-kind contributions to its Low Rent Public Housing Program each year for 30 years. Payments must be made from non-federal funds.

v. As of September 30, 2018, the City was in default of the terms of the 2016 Repayment Agreement. The City has not met the minimum required payment for each of the past three-years. As of June 30, 2018, the City's public housing program reported an outstanding balance of $427,110. If the payment terms were met the balance would have been $415,426 ($460,426 minus $15,000 x 3 years of payments). Accordingly, as of that date the City was in arrears $11,684. As stated in the Repayment Agreement in §C(2)(b), this failure, "serve[s] as grounds for HUD's declaring a breach of the Annual Contributions Contract...".

vi. The City's 2016 and 2017 Single Audit reports omitted the accrual and disclosure of the contingent liability owed to the public housing program. This omission resulted in a material misstatement to the City's financial statements for 2016 and 2017.

vii. Under Generally Accepted Accounting Principles (GAAP) and HUD requirements the notes to the City's audited financial statements should have included disclosure informing readers of the existence of the 2016 Repayment Agreement. The City's 2016 and 2017 Single Audits did not include the required footnote disclosures.

viii. The City has not addressed its continuing obligation to make the Federal awards program whole by replacing the units sold to ineligible buyers and restoring units that have fallen into disrepair. CLV's obligation to make the program whole is not in dispute and can be reasonably estimated. As of June 30, 2018, the City had yet to replace 15 of the 17 units sold to ineligible buyers. In addition, as of that date, 19 of the 39 unsold units remained off-line and in disrepair. Using an estimated average replacement/restoration cost of $112,000 per unit the City will need to expend at least $3.8 million of non-federal funds to make the Federal awards program whole (see Figure 3 of the Operational Assessment).

The City is required within 30 days of this letter to provide HUD with a recorded resolution from the City Council acknowledging the additional $3,808,000.00 liability and agreeing to enter into a new repayment agreement with HUD. As part of the repayment agreement, the

i. The City must restore $3,808,000.00, plus any amount remaining in the existing repayment agreement, to its low rent public housing program. All contributions must be made from non-federal sources.

ii. The City must immediately correct all books of account to properly record a contingent liability in the amount of $3,808,000.00 to conform to the requirements of the ACC and GAAP accounting standards.

iii. The City must recognize that the amounts repaid are considered federal funds and are restricted to eligible uses under the Low Rent Public Housing program rules and regulations.

If you have any questions regarding the information in this letter, please contact Mandy Griego at (505) 346-7357 or by email at Mandy.V.Griego@hud.gov.

Sincerely,

Donna Wickes
Regional Manager

The City of Las Vegas, New Mexico Public Housing Program (NM007)

Operational Assessment

October 31, 2018

Contents

City of Las Vegas, New Mexico Public Housing Program (NM007)

Operational Assessment

Operational Assessment Objectives

Objectives. As requested by of the Office of Public and Indian Housing (PIH), Office of Field Office Operations (OFO), staff from the Quality Assurance Subsystem (QASS) of the Real Estate Assessment Center (REAC) and the Office of Receivership Oversight (ORO) assessed the City of Las Vegas, New Mexico's ("CLV" or "the City") public housing program. The objectives of this engagement were to:

- Assess CLV's governance over its public housing program. Determine if the City complied with Federal laws, regulations and contract provisions.
- Assess the financial performance of CLV's public housing program. Perform a seven-year trend analysis to identify unusual financial trends that could impact the financial viability of the public housing program.
- Provide recommendations to OFO.

Executive Summary

Dysfunctional Governance. CLV has a long history of dysfunctional governance which adversely impacts its ability to manage its public housing program. Due in part to this dysfunction the City has violated the terms of its Annual Contributions Contract (ACC) with the Department of Housing and Urban Development (HUD), and is at risk of being declared in substantial default.

A default first occurred in 2004 when the City diverted Federal assets from its homeownership program for ineligible uses. HUD identified the default during a monitoring review in 2005. An outside consulting firm confirmed HUD's findings in 2012. In January 2013 HUD issued a demand letter requiring that diverted sales proceeds from its homeownership program be returned, homeownership program units sold to ineligible buyers be replaced, and units that had fallen into disrepair be restored to a habitable condition.

In February 2016 the City and HUD entered into a repayment agreement (2016 Repayment Agreement) for the diverted sales proceeds. The agreement did not cover the replacement of units sold to ineligible buyers or the rehabilitation of inhabitable units. Additional steps are necessary to make the public housing program whole; the City will need to expend an estimated $3.8 million of non-federal funds to cure this default.

Continuing Noncompliance. A December 2017 HUD monitoring review identified 18 findings including items that constituted substantial default under the terms of the ACC. At the time of this assessment seven of the 18 findings were still unresolved.

As of June 30, 2018, the City was in default under the terms of the 2016 Repayment Agreement. CLV has failed to make the minimum required annual payments and has not provided HUD with the annual reports required by that document.

CLV's 2018 electronic submission of financial information required under the Public Housing Assessment System (PHAS) was submitted late, resulting in late penalties applied to that indicator.[1] Moreover, the City's 2016 and 2017 Single Audit reports and financial information filed with HUD contained material accounting errors. Specifically, the City has incorrectly reported the debt owed under its 2016 Repayment Agreement with HUD and omitted its obligation to make the homeownership program whole.

To date HUD has not put the City on formal notice that it is at risk of substantial default under the terms of the ACC. HUD should provide the City with notice as soon as possible to protect its interests in its Federal awards programs.

Voluntary Program Transfer. Some members of the public housing program's governing body are interested in a voluntary transfer to another provider. The City's mayor opposes a transfer and has delayed a vote by the governing body.

Another provider is interested in taking over the program from the City and the State of New Mexico's housing statues are favorable to a multijurisdictional consolidation. The City's public housing program is financially solvent, and its units meet the minimum standard of decent, safe, and sanitary housing. The program will be in even better shape if the City caries through on its obligation to make the program whole.

Given CLV's ongoing history of non-compliance, HUD should support the voluntarily transfer of the City's public housing program to another provider. Before approving any transfer, CLV's repayment default will need to be addressed. Moreover, HUD will need to perform its due diligence to make certain that the transfer results in an outcome that is beneficial to all parties involved.

Current Operating Environment

Governance. CLV is a New Mexico municipal corporation that operates under a mayor-council form of government. The City's governing body consists of four (4) City Councilors (the City Council) and the Mayor, who is the presiding officer of the governing body.

Housing services in CLV are provided in accordance with the New Mexico Municipal Housing Act.[2] The City is authorized to enter into contracts with the

[1] Refer to 24 CFR Part 5, Subpart H and 24 CFR Part 990, Subpart C.

[2] Refer to New Mexico Statutes Annotated (NMSA) 3-45, the Municipal Housing Act.

federal government for the development and management of low-income public housing.

The City's housing department runs a 283-unit public housing program that receives Federal awards under an ACC with HUD. The housing department is not a legally separate entity even though it is sometimes referred to as the "Las Vegas Housing Authority." The City Manager selects the Housing Director with the City Council's concurrence.

To satisfy HUD regulatory requirements, for housing related matters, the City's governing body convenes 30 minutes prior to regularly scheduled City Council meetings, with a Resident Councilor as an additional voting member.[3] The City's Charter is silent as to the administration of its housing programs including how the Resident Councilor is appointed to the governing body.

The short duration of these meetings has proven to be insufficient for CLV to conduct housing related business in a prudent manner. Further, the governing body, as well as the City's senior leadership, have not demonstrated the capability or desire to operate HUD programs in accordance with Federal laws, regulations and contract provisions.

The City's current leadership includes an interim City Manager, an interim Finance Director, and an interim Housing Director. Although the governing body and senior leadership have changed several times over the past two decades, the City's dysfunctional governance over the public housing program persists.

Due in part to this dysfunction, the City has a long history of non-compliance with Federal laws, regulations and contract provisions that have resulted in default under the terms of its ACC with HUD. This non-compliance includes unauthorized disposition of encumbered assets at below market value to ineligible parties, diversion of sale proceeds for ineligible uses, federal procurement violations, and failure to establish and implement internal control policies and procedures.

While CLV has entered into a repayment agreement with HUD to partially reimburse the public housing program for diverted assets, at the time of this assessment the City was in default under the terms of that agreement. In addition, as further explained in the sections to follow the City will need to expend an estimated $3.8 million of non-federal funds to cure the ACC default and make the public housing program whole.

The City's fiscal year 2016 and 2017 Single Audit reports and associated financial information filed with HUD under the Uniform Financial Reporting Standards (UFRS) and PHAS regulations were materially misstated due to the omission of the estimated $3.8 million owed to the public housing program, and classification errors associated with the repayment agreement with HUD.[4]

Furthermore, as of the date of this assessment CLV's general fund did not have $3.8 million in unrestricted resources available to make the public housing program

[3] Refer to 24 CFR 964.415 - Resident board members.

[4] Refer to 24 CFR Part 5, Subpart H and 24 CFR Part 990, Subpart C.

whole. Therefore, this contingent liability adversely impacts CLV's financial position. The City may need to raise taxes, borrow money, or decrease services to its residents to defuse this obligation.

Diversion of Federal Assets. In October, 2002 CLV applied for and was approved by HUD's Special Applications Center (SAC) to operate a Section 5(h) homeownership program. This agreement, as amended in February 2013, authorized CLV to sell 60 existing ACC units to eligible buyers.

During 2004 CLV sold 21 homeownership properties raising $636,953 in net proceeds (Attachment 1). In April 2005 HUD conducted a monitoring review of the City's public housing program and issued a series of reports that identified that CLV was in violation of its ACC with HUD (2005 Monitoring Report).

HUD's findings from the 2005 Monitoring Report included a determination that 17 homeownership units were sold without HUD approval to ineligible buyers in violation of Sections 7 (Covenant Against Disposition and Encumbrances) and 8 (Declaration of Trust) of the ACC. In each instance HUD did not release the Declaration of Trust, resulting in a cloud on the title of the properties sold.

Fourteen of the 17 ineligible transactions involved sales to Region III Housing Authority of Albuquerque, NM (Region III Housing Authority) at significantly below fair market value (Attachment 1). During this timeframe units were selling to eligible buyers for $70,000 each. The Region III Housing Authority units were sold for $20,000 each, resulting in foregone proceeds of roughly $700,000 (Figure 1).

Figure 1 – Foregone Proceeds from Sales

Estimated fair market valve	$70,000
Sales price to Region III HA	(20,000)
Net variance	$50,000
Times total units below FMV	14
Foregone proceeds from sale	$700,000

The 2005 Monitoring Report also included a finding that proceeds from the sale of the homeownership units were expended for ineligible purposes in violation of Section 9 (Depository Agreement and General Fund) of the ACC. An October 12, 2012, report by the accounting firm Moss Adams (the 2012 Consultants Report) confirmed HUD's finding and determined that $634,564 of sales proceeds were used for ineligible costs.

Ineligible costs included the purchase of a property located at 2513 Hot Springs Blvd, Las Vegas, NM (Church property) for $150,656, travel and training related expenses of $23,482, procurement and contract violations totaling $353,483, and $106,943 of miscellaneous ineligible activities.

Accordingly, the value of the assets diverted by CLV from the homeownership program totaled over $1.33 million; the amount of sales proceeds spent on ineligible costs ($634,564) plus the amount of the foregone proceeds from the sale of units to Region III Housing Authority ($700,000) (Figure 2).

Figure 2 –Federal Assets Diverted by CLV

Total ineligable costs	$634,564
Foregone proceeds from sales	$700,000
Total Federal assets diverted	$1,334,564

The sale of CLV's homeownership units were suspended after the 2005 Monitoring Report was released. By the time the 2012 Consultants Report was issued, the 39 remaining properties in the program had fallen into disrepair and were no longer habitable.

In a letter dated January 30, 2013, HUD demanded that CLV deposit into its homeownership account $634,564 from non-federal funds to reimburse the Federal awards program for the ineligible costs identified in the 2012 Consultants Report. The City was required to spend those funds to replace the 17 units sold to ineligible buyers and modernize the 39 units that had fallen into disrepair, so they could be sold or rented to eligible participants.

HUD and CLV entered into the 2016 Repayment Agreement to resolve the $634,564 obligation identified in the 2012 Consultants Report. The amount due under the 2016 Repayment Agreement was decreased by $23,482 for amounts already reimbursed, and $150,656 for funds it transmitted as repayment for the ineligible purchase of the Church property. Therefore, the balance due over the 30-year term of the 2016 Repayment Agreement was $460,426.

The 2016 Repayment Agreement does not bear interest and requires the City is to make minimum annual payments of $15,000 in cash, $15,000 of in-kind capital improvements to its HUD properties (from non-federal resources), or to use a combination of cash and in-kind capital improvements to reach the $15,000 payment amount. The payments are due by June 30th each year. In addition, CLV is required to provide HUD with an annual report, due August 31st each year, indicating how the payment was satisfied.

As of September 30, 2018, CLV was in default under the terms of the 2016 Repayment Agreement. The City has not met the minimum required payment criteria for each of the past three-years. As of June 30, 2018, the City's housing department reported an outstanding balance of $427,110. If the payment terms were met the balance would have been $415,426 ($460,426 minus $15,000 x 3 years of payments). Accordingly, as of that date the City was in arrears $11,684. Moreover, the City has not provided to HUD the annual reports due under the 2016 Repayment Agreement.

It is important to point out that the City's $15,000 annual payments over the 30-year term of the agreement are woefully insufficient to replace the 17 homeownership units that were sold to ineligible buyers (with clouded title) and to restore the 39 units that fell into disrepair. The 2016 Repayment Agreement only addresses the reimbursement of homeownership sales proceeds that were spent on ineligible costs. It does not address the City's continuing obligation to make the Federal awards program whole by replacing the units sold to ineligible buyers and restoring units that have fallen into disrepair.

CLV's obligation to make the program whole is not in dispute and can be reasonably estimated. As of June 30, 2018, the City had yet to replace 15 of the 17 units sold to ineligible buyers. In addition, as of that date, 19 of the 39 unsold units remained off-line and in disrepair. Using an estimated average replacement/restoration cost of $112,000 per unit the City will need to expend at least $3.8 million of non-federal funds to make the Federal awards program whole (Figure 3).

Figure 3 – CLV's Contingent Liability to the HUD Federal Awards Program

Obligation	Units	Avg. Cost	Amount
Restore units sold to ineligible buyers	15	$112,000	$1,680,000
Refurbish offline homeownership units	19	$112,000	$2,128,000
Totals	**34**	**$112,000**	**$3,808,000**

2

5 demolished

This obligation meets the definition of a contingent liability since its repayment is probable and the amount owed can be reasonably estimated. Under Generally Accepted Accounting Principles in the United States (GAAP) the City should be accruing this liability in its financial statements and including disclosure in its footnotes.[5]

As further discussed in the Inaccurate Books of Record section of this report, CLV has omitted this contingent liability from its Single Audit reports and financial information filed with HUD in violation of Sections 5 (Covenant to Develop and Operate) and 15 (Books of Account, Records, and Government Access) of the ACC.[6]

Continuing Non-Compliance. CLV's inability to comply with Federal laws, regulations and contract provisions continues, even though the City's leadership has changed since the 2005 Monitoring Report and the 2012 Consultants Report were issued.

During September through November 2017 HUD conducted a monitoring review of CLV's public housing program and summarized its findings in a report dated December 22, 2017 (2017 Monitoring Report). The 2017 Monitoring Report identified 18 findings, including several that constituted a default under the City's ACC with HUD.

The 2017 Monitoring Report noted that CLV's 2018 housing department's operating budget was not prepared and approved by its governing body before the start of its fiscal year in violation of Section 11 (Operating Budget) of the ACC. Moreover, the City did not have a Depository Agreement in place with the financial institution handling its HUD program funds in violation of Section 9 (Depository Agreement and General Fund) of the ACC. Also, CLV did not have the required collateralization agreement in place with their financial institution in violation of Section 5 (Covenant to Develop and Operate) of the ACC.

[5] Refer to GASB Statement No. 62 – *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements* (Contingencies section, paragraphs 96-113).

[6] Refer to 24 CFR Part 5, Subpart H and 24 CFR Part 902, Subpart C.

The 2017 Monitoring Report included a determination that the City did not have policies and procedures in place to ensure that charges to the program were for eligible expenses in violation of Section 5 (Covenant to Develop and Operate) of the ACC. Additionally, HUD noted that CLV did not have a written internal control policy. As of the date of this assessment, seven of the 18 findings remained unresolved.

Additionally, CLV missed the deadline for transmitting its fiscal year 2018 financial information to HUD under the UFRS and PHAS regulations in violation of Sections 5 (Covenant to Develop and Operate) and 15 (Books of Account, Records, and Government Access) of the ACC.

Inaccurate Books of Record. As previously noted, on February 16, 2016, the City entered into a repayment agreement with HUD to reimburse its public housing program for the ineligible use of proceeds from the sale of homeownership units. The total repayment amount of $460,426 is due in installments of $15,000 per year over the 30-year term.

Under GAAP, only amounts due within one-year should be reported as current; the remaining balance is treated as long-term.

The City's 2016 and 2017 Single Audit reports and associated financial information filed with HUD included the entire balance outstanding as a current asset in the public housing program. This resulted in misstatements of $445,426 (43% of the current asset balance) and $430,426 (38% of the current asset balance) for fiscal years 2016 and 2017, respectively, since the long-term amount was included as current.

Additionally, under GAAP the notes to the City's audited financial statements should have included disclosure informing readers of the existence of the 2016 Repayment Agreement. CLV's 2016 and 2017 Single Audits did not include the required footnote disclosures.

Also, as previously noted, the City's 2016 and 2017 Single Audit reports omitted the accrual and disclosure of the estimated $3.8 million contingent liability owed to CLV's public housing program. This omission resulted in a material misstatement to CLV's financial statements for 2016 and 2017 in violation of Section 15 (Books of Account, Records, and Government Access) of the ACC.

PHAS Designation. As previously noted, as of the date of this assessment the City's financial indicator submission was past due resulting in late penalties applied to the score for fiscal year 2018. The public housing program overall designation for 2018 was "Substandard Management" due to the substantial number of units unavailable for occupancy stemming from the ACC violations previously discussed. The final score was a 63 out of 100, which is a 9 point decline from 2017.

For 2017, CLV's public housing program received a score of 72 out of 100 under PHAS but was designated as "Substandard Management" due to the fact that it failed the management indicator.

In 2017 CLV received a score of 11 out of 25 for the management indicator. Program participants must score 60% (15 points) or higher to avoid the substandard designation. The management indicator was adversely impacted by a high vacancy rate stemming from the offline homeownership units that had fallen into disrepair. In 2018 this score declined to a 5 out of 25

For 2017 CLV received a passing score for the PHAS physical indictor (32 out of the 40 available points) based on inspections completed in 2016. This suggests that the public housing units that are online are in decent, safe, and sanitary condition.

The City's 2017 financial indicator resulted in a passing score (24 out of 25 available points). CLV received a 1-point deduction for this indicator due to a compliance finding reported in the City's 2017 Single Audit report. The overall PHAS score was reduced by 4 points due to the late submission of the financial statements as previously discussed.

Program Transfer. Given CLV's long history of non-compliance with Federal laws, regulations and contract provisions, some members of the public housing program's governing body have expressed an interest in transferring the City's Federal awards program to another provider.

CLV's mayor opposes a transfer and has delayed a vote by the governing body. As noted throughout this document, the City has materially violated the terms of its ACC with HUD and has demonstrated an inability to administer the public housing program in accordance with the terms of that contract.

Given this operating environment, CLV should consider a transfer. The State of New Mexico statues offer cities significant flexibility for combining multijurisdictional housing programs through the Municipal Housing Act, as amended in 2009 and 2015.

The economies of scale gained from combining the housing program with a capable, financially stable partner could open pathways for decreasing costs while expanding access to more housing opportunities for its citizens. A rigorous due diligence process, aided by affordable housing expertise, could render feasible financial and program alternatives for the City's deliberation.

Results of Trend Analysis

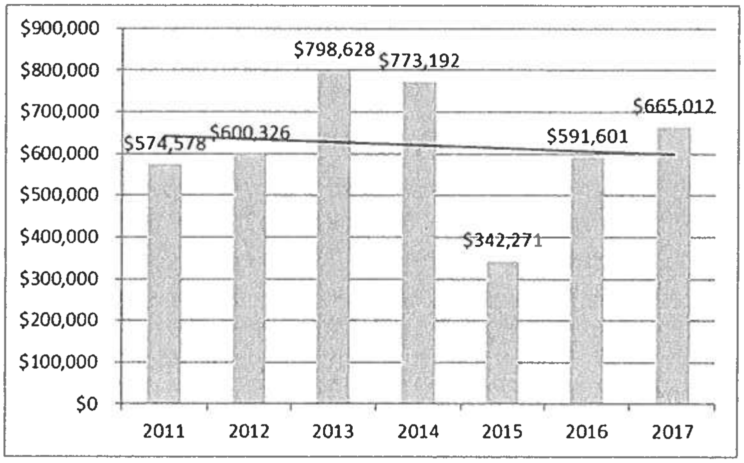
Public Housing Program is Solvent. Based on CLV's most recent Single Audit report (2017), it appears that its public housing program is solvent. The program has generated surpluses in four of the past seven reporting periods and its overall net position has increased by 5% since 2011.

The program has received the maximum points available under the PHAS financial indicator for three of the past five years, scoring 24 out of 25 available points for 2017. Even after the previously discussed accounting errors are factored in, the City's public housing program remains a "High Performer" for the financial indicator.

The public housing program is owed an estimated $3.8 million from the City to cure the previously discussed default associated with the homeownership program. If the City makes good on that obligation (which includes $460,426 due under the 2016 Repayment Agreement) the program should remain on sound financial footing for the foreseeable future.

Cash and Investments. The public housing program's cash and investment position increased $90,434 (16%) from $574,578 in 2011 to $665,012 in 2017. This increase is primarily attributable to surpluses generated in 2011, 2013, 2015 and 2017.

Figure 4 – Public Housing Cash and Investments

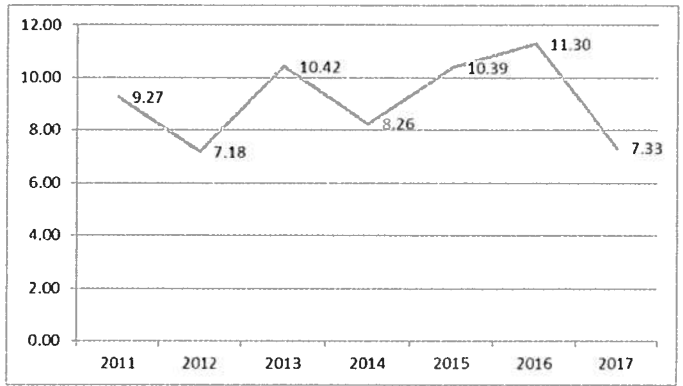


This balance includes restricted funds collected under the terms of the 2016 Repayment Agreement. As previously noted, those funds can only be used to replace homeownership units sold to ineligible buyers and to modernize units that had fallen into disrepair.

Current Ratio. One of the most common ways to measure an entity's viability is to calculate a current ratio, computed by dividing an entity's current assets by its current liabilities. This number reflects the current assets available to satisfy an entity's current obligations. A current ratio of 3.57, for example, indicates that $3.57 of current assets are available to meet each $1 of currently-maturing obligations. A ratio of less than one, on the other hand, suggests that an entity is insolvent since it owes more than it can currently afford to pay.

The public housing program's current ratio has fluctuated from a high of 11.3 (2016) to a low 7.18 (2012). For 2017 the current ratio was a robust 7.33 (Figure 5).

Figure 5 – Public Housing Current Ratio



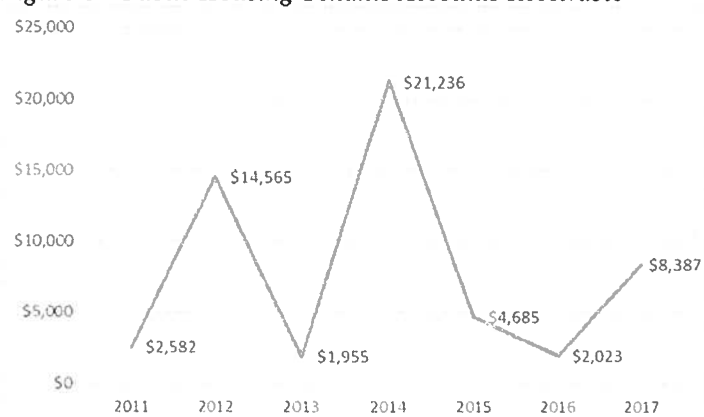
The public housing program's 2016 and 2017 current ratios are artificially inflated by the previously discussed accounting error associated with the 2016 Repayment Agreement. After adjusting for the misstatement, the program's 2016 ratio drops to 6.48. The 2017 ratio dips to 4.51.

The PHAS scoring system uses a quick ratio rather than a current ratio to measure liquidity. The quick ratio is very similar to the current ratio and measures essentially the same thing. Under PHAS program participants receive all available points (12) for the quick ratio when it is equal to or above two. Even after adjusting for the accounting error the program's quick ratio was well above two for 2016 and 2017. Accordingly, this accounting error did not impact the public housing program's financial indicator scores for 2016 or 2017.

Tenant Accounts Receivable. When evaluating the financial health of a public housing program, it is useful to assess the quality and liquidity of tenant accounts receivable. Quality refers to the likelihood of collection without a loss. Liquidity refers to the speed in converting accounts receivable to cash. The longer receivables are outstanding beyond their due date, the less the likelihood of their collection.

The public housing program's tenant accounts receivable balance increased $5,805 (225%) over the past seven years, from $2,582 in 2011 to $8,387 in 2017 (Figure 6).

Figure 6 – Public Housing Tenants Accounts Receivable



The balance fluctuated over that timeframe from a peak of $21,236 in 2014 to a low of $1,955 in 2013. The balance trended back upwards to $8,387 for 2017.

Capital Assets. The public housing program's capital asset balance increased $376,249 (9%) from $4.3 million for fiscal year 2011 to $4.68 million for fiscal year 2017 (Figure 7).

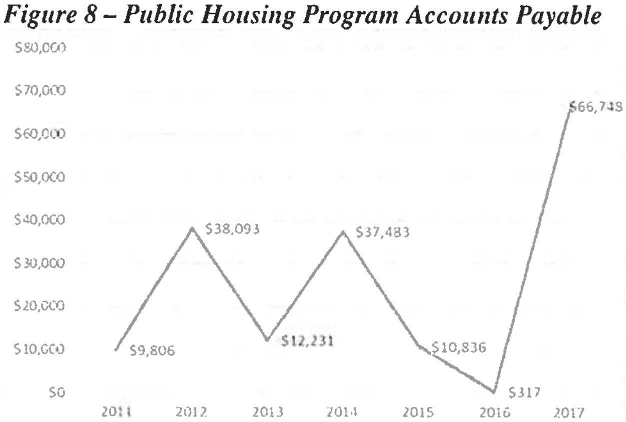
Figure 7 – Public Housing Program Capital Assets

Most of the increase is attributable to capital spending by the housing department to bring 20 of the 39 homeownership units back into service. As a result, the estimated remaining useful life of the properties increased from a low of 27% in 2014 up to 36% for 2016 and 2017.

Accounts Payable. Another useful measure for determining whether an entity is experiencing financial difficulty is its outstanding accounts payable balance. Entities with financial problems often face a shortage of cash which, in turn, causes them to defer payments to vendors, resulting in a higher accounts payable balance.

Over the past seven reporting periods the public housing program's accounts payable balance increased $56,942 (581%) from $9,806 for 2011 to $66,748 for 2017 (see Figure 8).

Figure 8 – Public Housing Program Accounts Payable

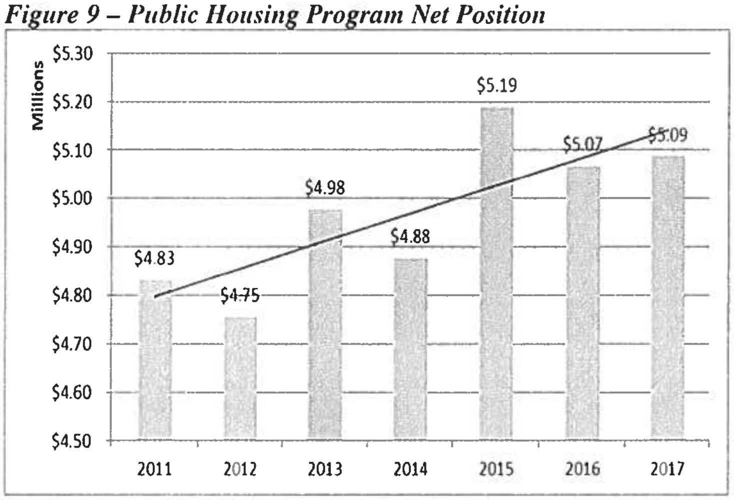


The balance has fluctuated significantly over the seven-year period covered by this analysis. As of June 30, 2018, the balance decreased to $27,481. As previously noted, the public housing program has sufficient current resources to pay these accounts in the ordinary course of business.

Net Position. The net position of a governmental entity represents its worth.[7] An increase in net position over a period of time generally suggests that the entity's financial position has improved. A decrease often suggests that it has deteriorated.

The public housing program's net position increased 5% ($255,037) over the past seven reporting periods from $4.83 million for 2011 to $5.09 million for 2017 (Figure 9).

Figure 9 – Public Housing Program Net Position



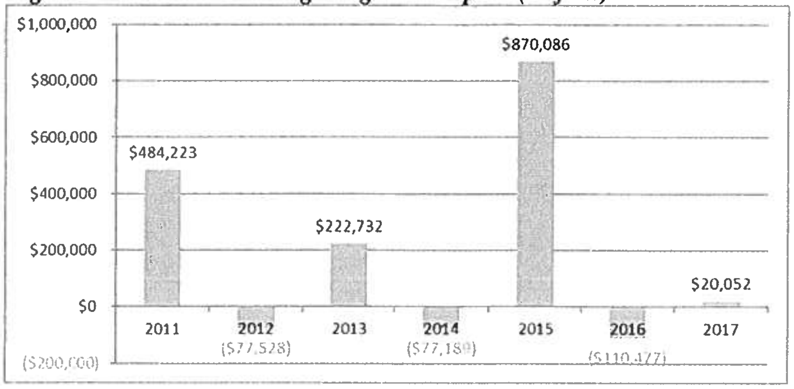
As previously discussed, the program's net position is materially understated due to the City's omission of a contingent liability owed the public housing program. As of June 30, 2017, the City recognized an obligation to repay the program $437,110 under the terms of the 2016 Repayment Agreement. It did not recognize the remainder of the $3.8 million contingent liability, resulting in a misstatement of approximately $3.37 million.

When the program's books are adjusted for this accounting error, the net position increases about 66% to $8.45 million.

Surplus (Deficit). CLV's public housing program has operated at a surplus for four of the past seven years. The largest surplus was reported in 2015 ($870,086). The deficits have been slight, occurring only after depreciation is reported. Deficits were reported in 2012, 2014 and 2016 (Figure 10).

[7]Worth is defined as net assets (assets minus liabilities)

Figure 10 – Public Housing Program Surplus (Deficit)



Putting aside the financial reporting issues and continuing instances of non-compliance, over the past seven years the public housing program has been operated in a fiscally prudent manner. With limited resources (primarily Capital Funds) the City's housing department has renovated and put back in service 20 of the 39 ACC units that fell into disrepair when the homeownership program was suspended.

Nevertheless, the City will need to identify an estimated $3.8 million dollars of non-federal funds to make the public housing program whole. As of June 30, 2017, the City reported in its general fund an unassigned fund balance of $2.78 million, far short of the amount needed to reimburse the Federal awards program. Accordingly, the City will have to raise taxes, borrow funds, or decrease service to its citizens to repay this obligation.

Recommendations

Section 17 (Notices, Defaults, Remedies) of CLV's ACC with HUD outlines the criteria for substantial default. One of the events that meets that criteria is when there is disposition or encumbrance of a project covered by the ACC without HUD's approval.

The 2005 Monitoring Report and the 2012 Consultant's Report identified 17 homeownership properties that were sold to ineligible buyers without HUD approval while still encumbered with a Declaration of Trust. Proceeds for the sale of those units were expended on ineligible costs.

In its January 30, 2013, letter to CLV HUD demanded that the homeownership program be reimbursed for the ineligible costs identified in the 2012 Consultant's Report and those funds be used to replace the 17 units sold to ineligible buyers and restore the 39 homeownership units that fell into disrepair when the program was suspended.

The 2016 Repayment Agreement outlines the terms under which the City is to reimburse the Federal awards program for ineligible costs associated with the use of homeownership proceeds. However, that agreement does not cover the CLV's obligation to replace the 17 units sold to ineligible buyers and to restore the 39 remaining homeownership units.

Although both parties recognize the City's obligation to make the Federal awards program whole, HUD has never formally notified CLV that a default on the ACC exists in accordance of Section 17 (Notices, Defaults, Remedies). HUD will need to formally put the City on notice to protect the Federal government's interests with respect to this contingent liability.

Moreover, the City is considering transferring its public housing program to another provider. CLV's default on the ACC will need to be addressed before any transfer can occur. Also, HUD should perform its own due diligence before approving the transfer of the City's public housing program to another provider.

Accordingly, QASS recommends that OFO consider the following options:

- Provide formal notice of the outstanding compliance issues, including noncompliance with the existing repayment agreement, required execution of an amended repayment agreement, resolution of open compliance findings) and allow a reasonable timeline to cure.

- Should CLV fail to cure the deficiencies within the timeline, declare them in substantial default as provided for under Section 17 (Notices, Defaults, Remedies) of the ACC.
 – court ordered –

- Encourage the City to transfer its public housing program to another provider. Make certain that all matters regarding CLV's substantial default are considered/resolved before approving any transfer. (permanent transfer).

- Perform due diligence before approving any proposed program transfer. The analysis should include a determination of whether the transfer is beneficial to the residents of Las Vegas, NM and to the receiving provider.

Each of the listed recommendations are only suggestions to consider in consultation with PIH's program offices and the Office of General Counsel. Other options, and other Federal, State, and local resources may be available to HUD to help facilitate the desired mission-based outcome of providing decent, safe, sanitary housing in good repair to CLV's public housing residents.

Attachment 1

Closing	Purchaser	Building	Unit	Address	Eligible?	Gross	Soft Mort.	Closing Cost	Net Proceeds
1/9/2004	Melainie Shipper	120	6036	2403 Yucca	No	$70,000	($15,000)	($2,628)	$52,372
2/10/2004	Jessie Kerr	101	6008	2414 Cholla	Yes	$70,000	($15,000)	($3,151)	$51,849
3/26/2004	Region III Housing	122	6038	2400 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	123	6039	2402 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	103	6012	2422 Cholla	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	124	6040	2404 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	115	6030	2417 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	114	6029	2419 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	128	6046	2414 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	129	6047	2416 Yucca	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	134	6053	2415 Cholla	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	108	6018	400 Sandoval	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	136	6056	2409 Cholla	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	112	6024	412 Sandoval	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	106	6016	304 Sandoval	No	$20,000		($714)	$19,286
3/26/2004	Region III Housing	107	6017	306 Sandoval	No	$20,000		($714)	$19,286
4/23/2004	Carmel May	100	6007	2412 Cholla	No	$70,000	($15,000)	($3,243)	$51,757
4/29/2004	Roy & Dorothy Shockey	98	6004	2406 Cholla	No	$70,000	($15,000)	($3,348)	$51,652
6/11/2004	Rebecca Vigil	218	6011	2420 Cholla	Yes	$70,000	($15,000)	($3,363)	$51,637
8/17/2004	Irisha Corral	97	6003	2404 Cholla	Yes	$70,000	($15,000)	($3,351)	$51,649
12/17/2004	April Valdez	132	6051	2419 Cholla	Yes	$75,000	($15,000)	($3,964)	$56,036
								Total	$636,953

Source: 2012 Consultant's Report

CITY OF LAS VEGAS HOUSING AUTHORITY
MONTHLY REPORTING
DECEMBER, 2019

OCCUPANCY	JULY	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE
UNITS AVAILABLE TO RENT	251	251	251	251	251	251						
UNITS UNDER LEASE	243	244	246	244	246	242						
TOTAL UNITS VACANT FOR MONTH	8	7	5	7	5	9						
MOVE-INS THIS MONTH	5	7	11	5	7	4						
APPLICATIONS												
APPLICATIONS ON FILE	53	64	73	74	80	72						
APPLICATIONS TAKEN THIS MONTH	23	21	18	13	10	3						
APPLICATIONS IN PROCESS	3	6	10	5	5	3						
APPLICANTS REQUIRING 504 ADA	1	0	0	0	1	0						
APPLICANTS DENIED IN GENERAL	2	0	0	1	0	0						
APPLICANTS DENIED FOR DRUG/CRIME RELATED	1	0	0	1	1	2						
TOTAL # OF DAYS FOR LEASE-UP TIME	3	3	4	4	5	5						
HOUSING MANAGEMENT												
FAMILIES THAT DID NOT PAY RENT ON TIME	18	28	21	20	23	20						
FAMILIES NOT PAID BY CUT-OFF	2	2	0	1	0	0						
FAMILIES THAT PAID BY CUT-OFF	16	25	21	18	23	19						
FAMILIES THAT ENTERED REPAYMENT AGREEMENT	0	1	0	1	0	1						
NOTICES ISSUED TO VACATE FOR NON-PAYMENT	2	1	0	1	0	0						
CONFERENCES HELD FOR LEASE VIOLATIONS	8	7	8	6	7	6						
NOTICES TO VACATE FOR LEASE VIOLATIONS	0	2	0	1	0	0						
NOTICES TO VACATE FOR DRUG/CRIME RELATED	0	1	0	0	0	0						
TOTAL # OF DOWN-TIME DAYS THIS MONTH	0	0	0	0	0	0						

HOUSING MAINTENANCE												
NUMBER OF EMERGENCY WORK ORDERS	3	4	6	7	27	8						
# OF EMERGENCY WORK ORDERS ABATED W/24 HRS	3	4	6	7	27	8						
# OF NON EMERGENCY WORK ORDERS ISSUED	89	116	100	135	84	64						
# OF NON-EMERGENCY WORK ORDERS COMPLETED	110	120	115	128	134							
# OF OUTSTANDING WORK ORDERS	130	136	141	95	105	83						
# OF UNITS MADE READY THIS MONTH	5	7	11	5	7	4						
AVERAGE # OF DAYS REQUIRED TO MAKE READY	24	31	43	20	25	20						
UPCS INSPECTION STATUS												
NUMBER OF UNITS INSPECTED YEAR TO DATE	24	49	70	96	115	133						
NUMBER OF EXT.BUILDS INSPECTED YEAR TO DATE	0	0	0	0	0	0						
NUMBER OF COMMON AREAS INSPECTED Y-T-D	0	0	0	0	0	0						
NUMBER OF BUILD SYS INSPECTED YEAR TO DATE	24	49	70	96	115	133						
CAPITAL FUND MODERN. PROJECTS												