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2002-PH-0002

TO: Joseph McCloskey, Director, Single Family Asset Management, HUF

Daniel G. Temme

FROM: Daniel G. Temme, District Inspector General for Audit, Mid-Atlantic, 3AGA

SUBJECT: AUDIT MEMORANDUM –Single Family Sales to Owner-Occupant Purchasers

INTRODUCTION

We completed a national audit of Single Family Sales to Owner-Occupant Purchasers. We performed the review to address specific matters noted in an internal Single Family Disposition Activities audit memorandum issued to the Philadelphia Home Ownership Center (HOC) on June 14, 2001.

We reviewed Single Family sales to Owner-Occupant purchasers under the jurisdiction of the Atlanta, Denver, Philadelphia, and Santa Ana HOCs. Our objectives were to determine if HUD policy for Single Family home sales to owner-occupant purchasers was followed and if HUD adequately monitored the process. Further, using computer assisted audit techniques, we were to quantify the extent of owner-occupant sales abuse and assess its impact on program mission and objectives.

To meet our objectives, we:

- Interviewed Headquarters, HOC, and contractor REO officials;
- Reviewed procedures and controls pertaining to sales of properties to owner-occupants;
- Reviewed a non-statistically selected sample of case files, from the Owner-Occupant universe of 151,750 sales from January 1995 through July 2001, to determine the accuracy of Single Family Accounting Management System (SAMS) data;
- Used databases of public records and confirmation letters, to review a statistically selected sample of 127 Single Family Sales to owner-occupant single property purchasers, from a universe of 146,809 sales from January 1995 through July 2001, to determine residency compliance; and,

- Obtained nationwide case data from SAMS, Computerized Homes Underwriting Management System (CHUMS), Single Family Insurance System (SFIS), Multifamily Tenant Characteristics System (MTCS), and Single Family Housing Enterprise Data Warehouse (SFHEDW) databases and used audit software to analyze the data and identify abuses to owner-occupant, Section 8 subsidy, and FHA initiatives.

We conducted our review between April 2001 and March 2002, and covered the period January 1, 1995 through July 31, 2001. The audit complied with generally accepted government auditing standards.

Within 60 days, please give us, for each recommendation in this report, a status report on: (1) the corrective action taken; (2) the proposed corrective action and the date to be completed; or (3) why action is considered unnecessary. Also, please furnish us copies of any correspondence or directives issued because of the audit.

Should you or your staff have any questions, please contact J. Phillip Griffin, Assistant District Inspector General, at (215) 656-3401, extension 3490.

SUMMARY

Under the Single Family Real Estate Owned (REO) owner-occupant sale initiative, HUD established an initial 10-day bidding period only open to individuals who certify that they will occupy a property for 12 months and have not purchased a HUD property within 2 years. However, we found that 29 percent of the purchasers did not comply with these requirements. Specifically, we statistically estimate purchasers bought 41,547 single properties, valued at $2.9 billion[1], that did not comply with residency requirements. Further, 1,550 purchasers bought 1,851 properties, valued at $107.3 million, in violation of purchase frequency limitations. The abuses occurred because HUD management was not aware of the magnitude of the problem, the HOCs did not specifically monitor owner-occupant sales due to other priorities and limited resources, and HUD's SAMS did not provide sufficient information to enable the HOCs and Management and Marketing (M&M) contractors to easily prescreen prospective buyers. These abuses likely prevented a number of prospective owner-occupants from acquiring homes, which undermined the initiative's intent to increase home ownership. Details of the review are included in Finding 1 of this memorandum.

BACKGROUND

FHA's Single Family Mortgage Insurance Program helps low and moderate-income families become homeowners by reducing down payments and limiting lender fees. Every year, thousands of borrowers default on their FHA-insured loans. When they default, FHA encourages lenders to work with them to bring their payments current. When they cannot do this, their homes may be sold to third parties, voluntarily conveyed to the lenders, or surrendered to lenders through foreclosure. Once lenders obtain the properties, the lenders generally convey title to the Secretary of HUD in exchange for payment of the insurance claim.

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[1] Statistically projected at 95 percent confidence level with a range of 37,392 and 45,702 properties valued between $1.9 and $3.9 billion.

As part of HUD's continuing reinvention efforts, FHA issued its 2020 Field Consolidation Plan for Single Family Housing and awarded contracts in March 1999 to manage and market its properties nationwide. The main contract objectives are to ensure: (1) properties are protected and preserved, properly managed, evaluated, and marketed in a manner which produces the highest possible return to the insurance fund; (2) average losses on sales and the average time properties remain in inventory are reduced; and, (3) the overall program and the image of properties is positive.

An integral component of HUD's Single Family Real Estate Owned (REO) disposition goals is to reduce the property inventory in a manner that expands homeownership opportunities and strengthens neighborhoods and communities. While both owner-occupant and investor purchasers may acquire HUD-owned properties, HUD designed the sales procedures to enhance owner-occupant purchase opportunities. When M&M contractors list HUD properties for sale, they establish an initial 10-day bidding period, which is only open to prospective owner-occupant purchasers. Since 1998, eligibility requirements included certifying that: 1) the buyer has purchased no other HUD-owned property within the last 24 months as an owner-occupant; and, 2) the property will be occupied as the primary residence for at least 12 months. Before 1998, 12-month residency was the only requirement. If the contractors do not receive an acceptable bid within the initial 10-day period, they open the bidding to investors and other buyers.

HUD's primary role is to monitor the M&M contractors' compliance with their contracts. HUD REO personnel accomplish this by conducting monthly M&M contractor case file and process observation reviews. HUD also contracts for file review and property inspection services. These third party contractors review M&M contractor performance in key areas relating to case management and file maintenance, property inspection, and maintenance and repair operations. The contractors conduct detailed inspections based on monthly sampling plans and report the results to HOC REO personnel. The REO staff analyzes the results and uses the information as one of the key components in preparing REO's monthly M&M contractor performance assessment.

Automated Systems

HUD uses various automated systems to track its many programs. A discussion of those systems included in our review is provided as Appendix A.

Prior Audits

In June 2001, we issued a report on the results of our review of the Philadelphia HOC's Single Family Disposition Activities. The report cited a number of improvements the Philadelphia HOC and Headquarters needed to make to strengthen HUD's M&M contractor oversight and use SAMS data more effectively. HUD has taken action to address the recommendations. In the report, we also identified potential abuse of the owner-occupant certification process. In regards to the latter point, we elected to perform a more detailed review of HUD's Single Family sales to individuals who certify they are owner-occupant purchasers.

FINDING 1: Owner-Occupant Purchasers Did Not Comply With Single Family Real Estate Owned Owner-Occupant Sale Initiative Requirements.

Owner-occupant single purchasers bought 41,547 properties, totaling $2.9 billion[2], but failed to comply with 12-month residency requirements. Further, owner-occupant multiple property purchases totaled 1,851 properties, valued at $107.3 million, in violation of program purchase frequency limitations. In addition, though not statistically significant, we found: 1) HUD provided HAP and tenant rent payments to 200 ineligible owner-occupant purchasers totaling $1.9 million annually, 2) 226 owner-occupant purchasers also leased another unit as a Section 8 tenant, and 3) HUD provided 1,156 owner-occupant property purchasers[3] with FHA loans which may have resulted in lower down payments. The abuses occurred because HUD management was not aware of the magnitude of the problem; the HOCs, due to other priorities and limited resources: did not specifically monitor owner-occupant sales, and did not adequately analyze HUD database information; and SAMS did not provide sufficient information to enable the HOCs and M&M contractors to easily prescreen prospective buyers. These abuses may have prevented prospective owner-occupants from acquiring homes, which circumvented the intent of the initiative to increase home ownership, and provided Section 8 subsidies and FHA loan assistance to ineligible purchasers.

The National Housing Act of 1934 confers on the Secretary the authority to manage, rehabilitate, rent, and dispose of properties acquired under the Single Family Property Disposition Program. Title 24, Code of Federal Regulations, part 291, implements statutory authority to manage and dispose of acquired properties. It defines the purpose of the property disposition program as: disposition of properties in a manner that expands homeownership opportunities, strengthens neighborhoods and communities, and ensures a maximum return to the mortgage insurance funds. It defines an owner-occupant purchaser as a purchaser who intends to use the property as his or her principal residence.

Handbook 4310.5, REV-2, dated May 17, 1994, *Property Disposition Handbook – One to Four Family Properties*, supplements the regulations. FHA's Office of Insured Single Family Housing, Asset Management Division, is responsible for administering the program.

HUD Notice H 98-7, issued February 5, 1998 states that the purpose of the Single Family Property Disposition Sales Program is to reduce the inventory of acquired properties in a manner that expands homeownership opportunities, strengthens neighborhoods and communities, and ensures a maximum return to the mortgage insurance fund. While both owner-occupant and investor purchasers may purchase HUD-owned properties, HUD's sales procedures are structured to enhance opportunities for owner-occupant purchasers.

There have been cases of alleged abuse where investors may have misrepresented themselves as owner-occupants when bidding on HUD-owned properties. In view of the Department's concern about the alleged abuse, and because HUD is not in a position to determine the integrity or

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[3] Statistically projected at 95 percent confidence level with a range of 1,040 and 1,272 property purchasers.

intention of every prospective purchaser, the Notice outlines two requirements in connection with individual owner-occupant sales. It requires that individual owner-occupants certify on an addendum to the sales contract: 1) that they have not purchased a HUD-owned property within the past 24 months as an owner-occupant; and 2) they will occupy the property as their primary residence for at least 12 months. Further, the selling broker must certify that he/she has not knowingly submitted the offer on behalf of an investor purchaser and has discussed the penalties for false certification with the purchaser. The certifications are required for both insured and uninsured sales. By implementing these requirements, the Department is hopeful that it can increase homeownership opportunities for owner-occupants by reducing the number of HUD-owned properties sold to investors under the guise of owner-occupants.

If a purchaser makes a false certification, local offices are to pursue a Limited Denial of Participation (LDP) in consultation with local HUD Counsel and consider referring the matter to the Inspector General for further investigation. The sales contract provides for a fine not to exceed $250,000 and/or a prison sentence of not more than two years. In flagrant situations, such as where an individual has submitted false certifications on multiple property sales, local offices must recommend debarment and refer the matter to the Inspector General.

The Notice also requires that local offices monitor cases where the prospective purchasers have indicated that they will occupy the property as their primary residence. The Single Family Accounting Management System (SAMS) identifies Social Security Numbers (SSNs) that have been entered previously into SAMS. If this occurs, the local office can produce a special report listing the case numbers for the properties purchased by that purchaser and identify whether the purchaser bought as an owner-occupant or an investor.

Local offices may also monitor cases by checking the Insurance in Force and Claims Systems to determine if the purchaser has any FHA mortgages and by talking to the prospective purchaser if there is any question. In addition, local offices may wish to explore the feasibility of obtaining credit reports and accessing local government records to determine if prospective purchasers already own property. As indicated above, should alleged cases of abuse surface, local offices should recommend a LDP in consultation with local HUD Counsel.

We used audit software to analyze the sale of 151,750 owner-occupant properties, valued at $11.2 billion, made from 1995 to August 2001. We isolated buyers with multiple and single owner-occupant purchase activity as follows:

Owner-Occupant Purchases

	Buyers	Properties	Sales
Multiple Purchases	2,259	4,941	$307 million
Single Purchases	146,809	146,809	$10.9 billion
Total	149,068	151,750	$11.2 billion

Once we identified single and multiple purchasers, we analyzed the data for residency and purchase frequency compliance.

Owner-Occupant purchasers violated residency requirements.

HUD requires the owner-occupant to certify: 1) on the Sales Contract that he will occupy the property as his primary residence; and, 2) on the Individual Owner-Occupant Certification that he will occupy the property as his primary residence for at least 12 months. However, the HOCs admitted that they did not actively monitor the residency requirement due to other priorities and limited resources. They relied on brokers' honesty to prevent violations and the M&M contractors to monitor residency compliance. The HOCs stated that they discovered most residency violations through complaints from unsuccessful bidders, prospective investors who were deprived of the bidding opportunity, neighbors, and the M&M contractors. When an investigation confirmed a violation, the HOC issued a LDP to the broker.

However, most M&M contractors pointed out that residency violations were not their responsibility under their contracts. Discussions disclosed that, usually, unsuccessful bidders, neighbors, prospective investors, or realtors notified them of potential residency violations. However, many of the contractors we interviewed disclosed various other methods for coping with the residency problem, including: 1) attempting to investigate potential violations on their own, 2) periodically conducting a partial review, and 3) maintaining their own database for review. Once they identified a potential violation, they notified the HOC for further action.

We used audit software to identify the owner-occupant buyers who made single purchases from January 1995 through July 2001. From the universe of 146,809 single purchases, totaling $10.9 billion, we selected a statistical sample of 127 properties with sales values totaling $8.7 million to test for 12-month residency compliance. We used databases of public records to determine residency status based on property transfer records, Deed transfers, Tax Assessor records, and mortgage records. Our sample results disclosed the following:

Residency Violations

Category	Properties	Percent	Sales	Percent
Violated Residency	36	28.3	$2.2 million	25.7
Questionable Residency 1/	24	18.9	$1.8 million	20.7
No Violation	67	52.8	$4.7 million	53.6
Total	127	100.0	$8.7 million	100.0

1/ Determination made based on conflicting public records data.

Using statistical procedures, we projected the results over the universe of 146,809 properties, valued at $10.9 billion. As a result, we calculated that owner-occupants purchased 41,547 properties, totaling $2.9 billion[4], and violated the 12-month residency requirement. Thus, sales to owner-occupants, who are in actuality investors, may have deprived legitimate buyers of homeownership opportunities. Headquarters needs to re-emphasize the importance of the owner-occupant sale initiative and direct the HOCs to review residency compliance.

[4] Statistically projected at 95 percent confidence level with a range of 37,392 and 45,702 properties valued between $1.9 and $3.9 billion.

Owner-Occupant purchasers exceeded the purchase frequency limitation.

A buyer with multiple owner-occupant purchase history can indicate program abuse since the buyer may not have met residency requirements and may have exceeded buying frequency limitations. Since 1998, HUD required the owner-occupant to certify that he had not purchased a property within 24 months of the certification date. Before 1998, 12-month residency was the only requirement. SAMS flagged SSNs for purchasers with a history in SAMS to indicate potential ineligibility. Unfortunately, the flag did not account for the period or type of action involved, or provide any other information to facilitate an eligibility determination. M&M contractors had to request further investigation by the HOCs, which involved obtaining ad hoc reports from the SAMS database. Because this was a time-consuming and often fruitless undertaking, the HOCs supported this effort with varying degrees of efficiency. As a result, the contractors coped with the problem in different ways. Contractors: 1) investigated the purchaser on their own; 2) relied on the broker to screen the purchaser; 3) maintained their own database to identify multiple purchasers; or, 4) waited for results of the HOC investigation.

Using audit software, we found 2,259 owner-occupant multiple property buyers purchased 4,941 properties, totaling $307 million, during the period from January 1, 1995 through July 31, 2001. Further, we stratified these buyers as follows:

Owner-Occupant Buyers with Multiple Purchase History

Properties Purchased	Number of Buyers	Number of Properties	Total Value
4 or more	66	364	$19,680,007
3	191	573	34,793,416
2	2,002	4,004	252,582,194
Total	2,259	4,941	$307,055,617

We then analyzed the 4,941 purchases to determine if the 2,259 buyers complied with program purchase frequency limitations (increased from 1 every 12 months to 1 every 24 months in 1998). We found that 1,550 ineligible buyers purchased 1,851 properties, priced at $107.3 million, during our review period. Details are shown below:

Unauthorized Multiple Purchases

	Unauthorized Purchases			Total Purchases		
	Pre-1998	**1998-2001**	**Total**	**Pre-1998**	**1998-2001**	**Total**
Properties	364	1,487	1,851	1,093	3,848	4,941
Buyers	294	1,256	1,550	837	1,422	2,259
Sales (millions)	$15.5	$91.8	$107.3	$51.1	$255.9	$307

We noted that the trend toward unauthorized purchases is increasing. The percentage of ineligible buyers purchasing properties increased from 35.1 percent before 1998, to 88.3 percent from 1998 through July 2001.

Our analysis also showed that a number of buyers acquired properties as both owner-occupants and investors. We identified 3,817 buyers who purchased 4,762 homes, priced at $271.6 million, as owner-occupants and an additional 11,229 homes, totaling $566.9 million, as investors during our period of review.

The charts and our analyses indicated that a significant number of owner-occupant purchasers abused the program and deprived potential buyers of homeownership opportunities. We believe HUD managers were not aware of the magnitude of the owner-occupant problem and therefore did not emphasize this issue. The HOCs relied on the M&M contractors to identify purchase frequency and residency violations. The contractors noted that they were not required to prescreen potential buyers, but some of them tried anyway. However, the contractors identified most residency violations through complaints by neighbors, failed bidders, prospective investors, and realtors. We noted that it was a reactive process, rather than a preventive process. Headquarters needs to revise the SAMS program to provide additional SAMS history information, such as property address, date, and outcome, when flagging an SSN to indicate prior SAMS history. The HOCs and M&M contractors need to use this information to screen prospective buyers to ensure that they are not violating owner-occupant REO purchase frequency limitations.

<u>HUD provided Section 8 subsidy payments and FHA loans to ineligible purchasers.</u>

Using audit software, we compared the MTCS database to the owner-occupant database obtained from the SAMS database to determine whether HUD provided owner-occupant purchasers with subsidies for the units they occupied and/or subsidy payments as tenants of other units. We found that HAP and tenant rent payments provided to 200 owner-occupant purchasers totaled $1.9 million annually. An additional 226 owner-occupants of 230 properties, valued at $15.5 million, also leased another unit as a Section 8 tenant.

Additionally, we analyzed FHA insured loans to determine whether HUD provided multiple owner-occupant purchasers with insured loans for other properties. We reviewed our single purchase owner-occupant sample to determine whether residency violators also received FHA insured loans for other properties. Projecting the resulting number of violators with FHA loans over the universe of owner-occupants, we estimated 1,156 owner-occupants[5] violated residency requirements and received FHA loans for other properties.

Although not statistically significant, we noted that these owner-occupants received Section 8 subsidies and FHA loan assistance for which they were not entitled. However, based on the volume of owner-occupant purchases reviewed, we do not consider these to be major problem areas.

[5] Statistically projected at 95 percent confidence level with a range between 1,040 and 1,272.

We discussed the results of our audit with Single Family officials during the review and at an exit conference held on March 18, 2002. During our exit conference, Single Family officials generally agreed with our finding and recommendations. Comments were due May 28, 2002 and we provided a one-week extension to June 5, 2002. Since Single Family officials did not provide comments by the extended due date, we are issuing the report without comments.

RECOMMENDATIONS

We recommend that HUD:

1A. Revise the SAMS program to provide information, such as: property address, action date, and outcome, when flagging an SSN to facilitate screening of prospective purchasers to prevent unauthorized purchases.

1B. Direct HOCs and M&M contractors to use the additional SAMS information to screen prospective buyers to prevent purchase frequency violations.

1C. Re-emphasize the Owner-Occupant sales initiative and direct the HOCS to perform residency compliance reviews as outlined by HUD Notice H 98-7.

MANAGEMENT CONTROLS

In planning and performing our audit, we considered HUD management controls to determine our auditing procedures, not to provide assurance on the controls. Management controls include the plan of organization, and methods and procedures adopted by management to ensure that its goals are met. Management controls include the processes for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance.

We determined that the following management controls were relevant to our audit objectives:

- The Single Family Accounting Management System (SAMS) used to identify potential violators of owner-occupant sales requirements.

- The processes used to identify purchase frequency and residency violators.

- The interfaces between the Single Family owner-occupant sales initiative and other programs, such as Section 8 subsidies and FHA loans.

- Monitoring procedures to ensure HUD policy for Single Family home sales to owner-occupant purchasers was followed.

It is a significant weakness if management controls do not provide reasonable assurance that the process for planning, organizing, directing, and controlling program operations will meet an organization’s objectives.

Based on our review, we believe the following items are significant weaknesses:

- When flagging potential purchase frequency violators, SAMS did not include sufficient information to facilitate the investigation.

- Due to other priorities and lack of resources, the Home Ownership Centers (HOCs) did not ensure that owner-occupant purchases were reviewed for frequency and residency violations.

APPENDIX A

HUD COMPUTER SYSTEMS INCLUDED IN THE AUDIT

Single Family Accounting Management System (SAMS)

SAMS provides data for management, processing, and monitoring of acquired and custodial single-family properties. SAMS is designed to facilitate the processing of properties through disposition and to perform a variety of accounting functions. The case management process within SAMS records all data associated with the acquisition, maintenance, and disposal of single-family properties. This process also allows HUD management to monitor the timely processing of properties. For financial management, SAMS records accounting information regarding tax payment, other accounts payable, cash disbursements and collections, and provides general accounting information, including total direct costs of property disposition. SAMS tracks 10 case management processing steps, from acquisition to final sales closing. The system maintains all accounting data associated with the case records in accordance with the requirements of the Director, General Accounting Office (GAO), Department of the Treasury, Office of Management and Budget (OMB) and Generally Accepted Accounting Principles (GAAP).

Computerized Homes Underwriting Management System (CHUMS)

This system assists and supports Field staff in processing single-family mortgage insurance applications, from initial receipt through endorsement. HUD processes various types of applications in CHUMS, including loans for First Time Homebuyers, Home Equity Conversion Mortgages, substantial rehabilitation of existing properties, and VA Certified FHA loans. In addition to tracking and processing assistance, it provides automated assistance in appraisal and mortgage credit evaluation and provides management information for Field Office Monitoring of case processing. It supports the conditional commitment process from the mortgagee's request for property appraisal through the issuance of a conditional commitment, firm commitment, endorsement, and the automated production of the Mortgage Insurance Certificate.

Single Family Insurance System (SFIS)

SFIS is the primary repository of the FHA's single-family mortgage insurance inventory. Since October 1983, HUD has used SFIS to maintain the insurance-in-force (IIF) database, which contains case information on FHA-insured single-family properties. SFIS allows on-line access to FHA case information. HUD personnel make inquiries and process actions on single-family mortgages insured by HUD. The SFIS process begins with endorsement of a case and continues through termination of the case and maintenance of post-termination case history.

Single Family Housing Enterprise Data Warehouse (SFHEDW) (also referred to as SFDW)

The SFHEDW is an integrated data warehouse, which contains critical SF Business data from the FHA's Single Family automated systems (also referred to as Legacy systems). HUD developed the SFHEDW in response to the Single Family Housing Information Strategy Plan (ISP). A number of diverse automated systems, residing on a variety of platforms, support the FHA's Single Family programs. The warehouse provides integrated case level information covering all processes in the mortgage insurance life cycle.

Multifamily Tenant Characteristics System (MTCS)

MTCS provides the central data repository for households assisted by Section 8 (Existing Certificate, Voucher, and Moderate rehabilitation), and Public Housing programs managed by the Office of Public and Indian Housing. HUD uses the MTCS information to monitor compliance with a wide variety of statutory and regulatory requirements set forth by the Offices of Public and Indian Housing, and Fair Housing and Equal Opportunity. The Office of Policy Development and Research uses MTCS information to develop policies and to monitor HUD assisted Housing programs. Administrators of HUD programs rely upon this information on families moving into and already living in housing assisted by these programs. The system provides access to FHA Multifamily Housing summary information, in order to show a total picture of housing assistance received by location of recipients.

APPENDIX B

DISTRIBUTION OUTSIDE OF HUD

Ranking Member, Committee on Governmental Affairs, 340 Dirksen Senate Office Building, US Senate, Washington, DC 20510

Chairman, Committee on Governmental Affairs, 706 Hart Senate Office Building, US Senate, Washington, DC 20510

Chairman, Committee on Government Reform, House of Representatives, 2204 Rayburn Building, Washington, DC 20515

Ranking Member, Committee on Government Reform, House of Representatives, 2185 Rayburn Building, Washington, DC 20515

Subcommittee on Oversight and Investigations, Room 212, O'Neil House Office Building, Washington, DC 20515

Associate Director, Housing and Telecommunications Issues, US General Accounting Office, 441 G Street, NW, Room 2723, Washington, DC 20548

Chief, Housing Branch, Office of Management and Budget, 725 17th Street, NW, Room 9226, New Executive Office Building, Washington, DC 20503

House Committee on Financial Services, 2129 Rayburn House Office Building, Washington, DC 20515

Senior Advisor, Subcommittee on Criminal Justice, Drug Policy and Human Resources, B373 Rayburn House Office Building, Washington, DC 20515

Director, Office of Federal Housing Enterprise Oversight, 1700 G Street, NW, Room 4011, Washington, DC 20552

Senior Counsel, Committee on Financial Services, U.S. House of Representatives, B303 Rayburn H.O.B., Washington, DC 20515

Department of Veterans Affairs, Office of Inspector General, 810 Vermont Avenue, NW, Washington, DC 20420

Department of Veterans Affairs, OIG Audit Operations Division, 1100 Main, Room 1330, Kansas City, Missouri, 64105-2112