U.S. Department of Housing & Urban Development

FY 2019 Agency Financial Report

About This Report

The U.S. Department of Housing and Urban Development (HUD) Agency Financial Report (AFR) for Fiscal Year (FY) 2019 presents the Department's stewardship of financial resources entrusted to its care. HUD has chosen to produce an AFR and an Annual Performance Report (APR), which highlights the organization's efforts to execute its mission. When published these reports will be available on HUD's website at: https://www.hud.gov/program_offices/cfo.

The FY 2019 AFR is available on HUD's website at: https://www.hud.gov/sites/dfiles/CFO/documents/afr2019.pdf.

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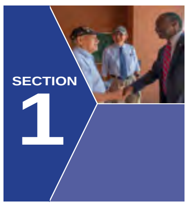
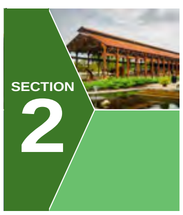
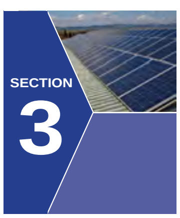
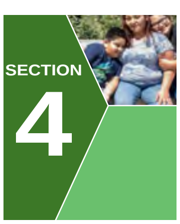
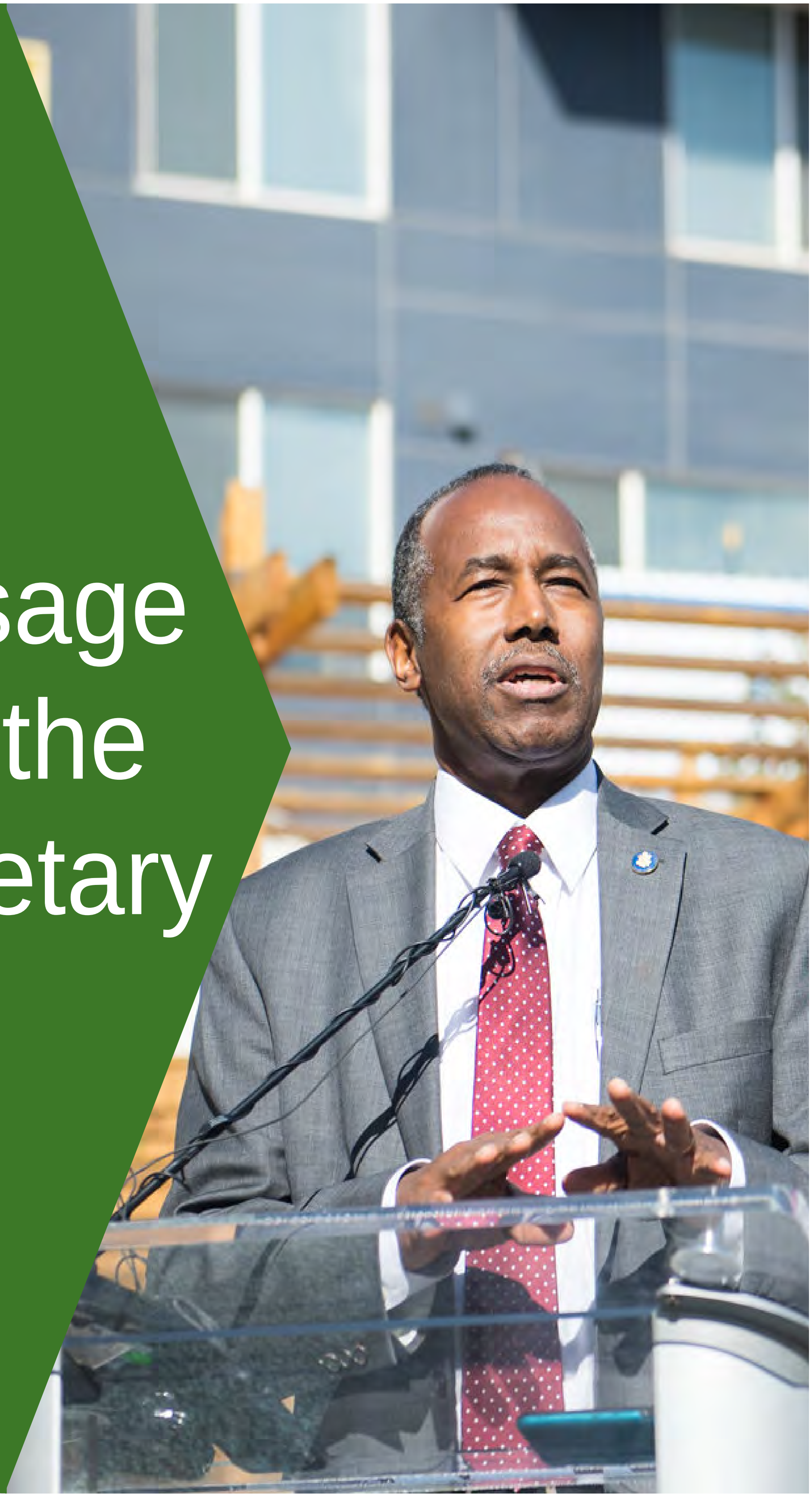






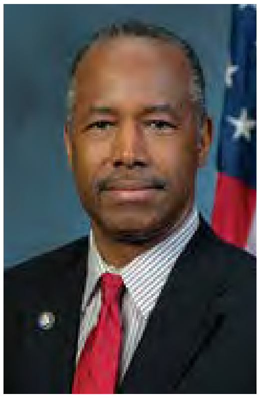


Message from the Secretary



Message from the Secretary

November 19, 2019



I am pleased to present the fiscal year (FY) 2019 Agency Financial Report (AFR) for the U.S. Department of Housing and Urban Development (HUD). This report features our financial and performance highlights over the fiscal year ending September 30, 2019. Our mission at HUD is to create strong, sustainable, inclusive communities and quality affordable homes for all. We fulfill this mission by administering more than 200 housing programs.

In FY 2019, the Department set and exceeded several milestones to serve the American people. Some of them include:

- HUD began the fiscal year by addressing our most critical issues, one of which, is healthy homes. In addition to other funds, we awarded a record $330 million to protect families from lead and other housing-related health hazards and followed through with several research initiatives in our effort to ensure sustainable, healthy homes.
- HUD was proactive in disaster recovery across the country, providing disaster assistance for California fire victims, Florida storm victims, strengthening mortgage relief for disaster-affected homeowners, and partnering with 23 public housing agencies to address emergency safety and security improvements.
- The occurrence and circumstances of natural disasters are challenging, but HUD's Community Development Block Grant-Disaster Recovery (CDBG-DR) funds allow residents in affected communities to put their lives back together again. HUD awarded nearly $1.5 billion to support seven states in their recovery from 2018 major disasters, oversaw unprecedented amounts of funds to affected areas, particularly insular territories, and partnered with public and private agencies to restore damaged and destroyed homes, businesses and infrastructure. HUD also plans to appoint a Federal Financial Monitor to oversee the disbursement of disaster recovery dollars to Puerto Rico.
- HUD is integral on the White House Council on Eliminating Barriers to Affordable Housing, and continues to work with agencies, states, local governments, tribal governments, and private-sector stakeholders to identify policies that artificially increase the cost of developing affordable housing and to take action to eliminate those barriers.
- The Government National Mortgage Association (Ginnie Mae) continues to bring global capital into the housing finance market, a system that runs through the heart of our nation's economy, while minimizing risk to the taxpayer.

- HUD supports the nationwide commitment to ending homelessness by many initiatives dedicated to providing long-term housing across America. Our efforts have yielded impressive results, with a decline in homelessness for veterans and families with children.
- HUD has taken a comprehensive look at innovation to address the challenge of a fiscally constrained environment. Whether it involves manufactured homes, technology systems, resilience, supply chains, or other costs, HUD has fostered information exchange and research focused on innovative, sustainable solutions.
- HUD has made significant improvements in its financial controls and oversight through its financial transformation efforts and streamlining operations. We have made remarkable progress in resolving long-standing financial control issues. In addition, HUD began an Agency-wide business modernization effort by implementing Robotic Process Automation and Artificial Intelligence into key business processes and implementing Data Analytics initiatives into our programs.

While HUD takes great pride in our accomplishments this year, we believe there are opportunities for improvement, and strive to make those improvements in a timely manner. We continue to work closely with the Office of Inspector General (OIG) to gain its perspective about our most significant management and performance challenges and found that we will need to ensure our *2013 Disaster Relief Appropriations Act* grantees comply with the Act's 24-month statutory expenditure requirement.

HUD is committed to ensuring transparency and accountability of the funds the public and Congress entrust to us. I can commit to providing reasonable assurance that the number of internal weaknesses identified in FY 2019 will be lower in FY 2020. I have trust in our team that we will continue to identify and improve our challenging areas while exercising sound fiscal management.

HUD is proud of the tremendous work we carried out in FY 2019 on behalf of our fellow Americans. We will continue our focus on improving the programs we utilize to house millions of American families.

Sincerely,

Benjamin S. Carson, Sr.
Secretary

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Management's Discussion and Analysis

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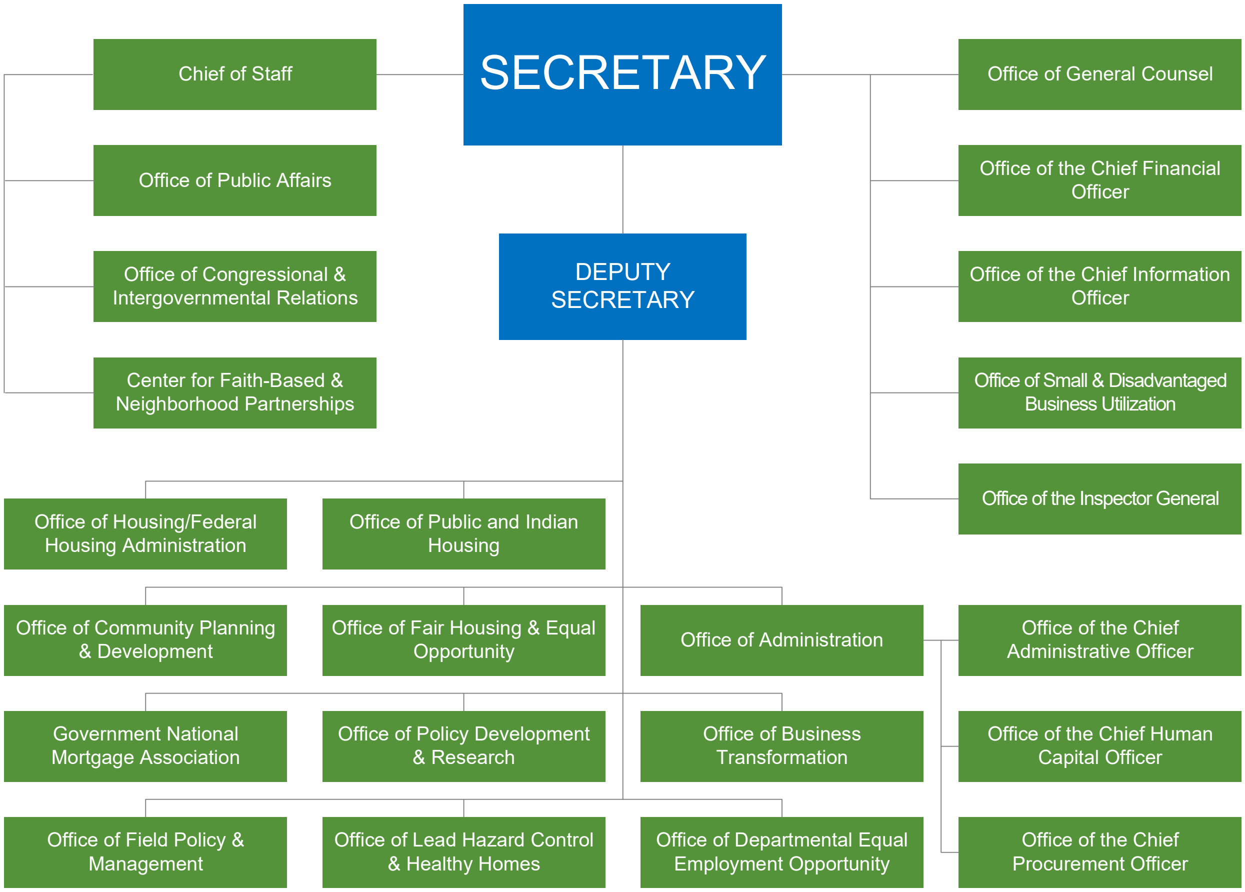
Mission, Organization, and Major Program Activities

HUD's Mission

HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all.

HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination; and transform the way HUD does business.

HUD's Organization and Reporting Structure



Major Program Activities

Government National Mortgage Association (Ginnie Mae)

Ginnie Mae's mission is to bring global capital into the housing finance market — a system that runs through the heart of our nation's economy — while minimizing risk to the taxpayer.

Ginnie Mae makes affordable housing a reality for millions of low and moderate-income households across America by channeling global capital into the nation's housing markets. Specifically, the Ginnie Mae guaranty allows mortgage lenders to obtain a better price for their mortgage loans in the secondary mortgage market. The lenders can then use the proceeds to fund new mortgage loans available. Without that liquidity, lenders would be forced to keep all loans in their own portfolio, meaning they would not have adequate capital to make new loans.

Office of Community Planning and Development (CPD)

CPD seeks to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for-profit and non-profit organizations. The following offices support the work of CPD through programs listed on the respective pages.

- Office of Rural Housing and Economic Development
- Office of HIV/AIDS Housing
- Office of Special Needs Assistance
- Office of Affordable Housing Programs
- Office of Block Grant Assistance

Office of Lead Hazard Control and Healthy Homes (OLHCHH)

OLHCHH provides funds to state and local governments to develop cost-effective ways to reduce lead-based paint hazards. In addition, OLHCHH enforces HUD's lead-based paint regulations, provides public outreach and technical assistance, and conducts technical studies to help protect children and their families from health and safety hazards in the home.

Office of Fair Housing and Equal Opportunity (FHEO)

The mission of FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of federal fair housing policies and laws.

FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. In addition, FHEO ensures fair housing compliance by housing providers that receive HUD funding. FHEO responsibilities include:

- Investigating complaints from the public;
- Ensuring civil rights compliance in HUD programs;
- Assisting states and localities with fair housing investigations;
- Increasing public awareness of housing related civil rights;
- Awarding and monitoring fair housing grants; and
- Enhancing economic opportunity for low-income populations.

Office of Public and Indian Housing (PIH)

PIH oversees and monitors a range of programs for low-income families. The mission of PIH is to ensure safe, decent, and affordable rental housing for low-income families; create opportunities for residents' self-sufficiency and economic independence; assure fiscal integrity by all program participants; and support mixed income developments to replace distressed public housing.

As of September 1, 2018, PIH's workforce totaled 1,282 within 11 major offices at Headquarters, 45 field offices, and six Office of Native American Program (ONAP) Area Offices, all overseeing three major business areas:

- Housing Choice Voucher Programs
- Public Housing Programs
- Native American Programs

Office of Housing

The Office of Housing plays a vital role for the nation's homebuyers, homeowners, renters, and communities through its nationally administered programs. It includes the Federal Housing Administration (FHA) the largest mortgage insurer in the world. The Office of Housing is the largest office within HUD, and has the following key responsibilities:

- Operating FHA, which provides over $1.3 trillion in mortgage insurance on mortgages for Single Family homes, Multifamily properties, and Healthcare facilities;
- Managing HUD's Project Based Rental Assistance (PBRA) and other rental assistance programs, which provide support for low and very low-income households;
- Supporting (Section 202) Housing for the Elderly and (Section 811) Housing for Persons with Disabilities programs, which provide affordable housing for some of the nation's most vulnerable populations;
- Encouraging recapitalization of the nation's aging affordable housing stock through programs such as the Rental Assistance Demonstration;
- Facilitating housing counseling assistance through HUD's Office of Housing Counseling; and
- Operating HUD's Manufactured Housing program, which administers federal standards for the design and construction of manufactured homes across the country.

The Office of Housing includes the following program offices that are most familiar to lenders, other housing industry participants, and consumers:

- Office of Single-Family Housing administers FHA's mortgage insurance programs for mortgages secured by new or existing single family homes, condominium units, manufactured homes, and homes needing rehabilitation. It also administers FHA's reverse mortgage program, the Home Equity Conversion Mortgage (HECM), for seniors.
- Office of Multifamily Housing administers FHA's mortgage insurance programs that facilitate the construction, substantial rehabilitation, purchase, and refinancing of multifamily properties. It also administers subsidized housing programs that provide rental assistance to low-income families, the elderly, and those with disabilities, as well as the preservation and recapitalization of assisted affordable housing through such programs as RAD.
- Office of Healthcare Programs administers FHA's mortgage insurance programs that help finance the construction, renovation, acquisition, or refinancing of healthcare facilities — including hospitals, nursing homes, and assisted living facilities.
- Office of Housing Counseling administers programs that support a nationwide network of HUD-approved Housing Counseling Agencies, which provide counseling to current and prospective homeowners, renters, and victims of disasters so that

they can make informed choices when addressing their housing needs. It also funds housing counseling grants and oversees the certification process for Housing Counselors.

- Office of Manufactured Housing administers HUD's oversight programs for the regulation and solutions-oriented oversight and monitoring of the affordability, quality, durability, and safety of manufactured homes. It also administers the *National Manufactured Housing Construction and Safety Standards Act* of 1974.
- Other Offices:
  - Office of Risk Management and Regulatory Affairs examines the financial, credit and operational risks facing the Office of Housing, and articulates effective strategies and procedures to mitigate current and emerging risks. The strategies and procedures to mitigate these risks are based on best risk management practices and established governance policy. In pursuit of this goal, the office promotes a risk-conscious climate in a manner consistent with the mission of the Office of Housing.
  - Office of Finance and Budget, which includes HUD's Asset Sales Office.

Office of Business Transformation (OBT)

OBT is responsible for driving organizational, programmatic and operational change across the department to maximize agency performance. The Office facilitates the Department-wide strategic planning process with the Secretary, the senior leadership team, and external stakeholders. This process includes identifying and monitoring strategic priorities, transformational change initiatives, and monitoring key performance measures against established targets. The Office also provides grants management oversight of competitive grants to ensure policies and regulations are aligned across HUD.

Performance Goals, Objectives, and Results

Progress Update on FY 2018-2019 Agency Priority Goals

HUD's FY 2018-2022 Strategic Plan defines the Department's strategic goals and objectives. The Department's annual targets for achieving strategic goals and objectives include major milestones and performance indicators, as published in the FY 2020 Annual Performance Plan (APP) and FY 2018 APR. HUD focused on four FY 2018-2019 Agency Priority Goals (APGs). This portion of the FY 2019 AFR focuses on HUD's progress towards achieving APGs.[1] A partial summary of progress for FY 2018-2019 APGs can be found below.[2]

The Prescription for HUD

[1] APGs do not reflect the full scope of HUD's strategic goals and mission. APGs highlight Departmental Leadership's highest policy and programmatic priorities in two-year increments.
[2] For a complete review of HUD's FY 2019 performance, please see the FY 2019 APR, which is scheduled to be published in February 2020. Current and past APRs can be accessed online at: www.hud.gov/program_offices/spm/appr.

Secretary Carson has coalesced his policy and management agenda into the Prescription for HUD. The Prescription is comprised of the three HUD Strategic Goals: I) Advance Economic Opportunity, which empowers people to move beyond HUD assistance and up the economic ladder; II) Protect Taxpayer Funds, which focuses on eliminating fraud, waste, and abuse; and III) Streamline Operations, which works to radically streamline and simplify our programs and rules. These goals are further defined by HUD's Strategic Goals and APGs as defined below.

I: Advance Economic Opportunity: HUD is advancing economic opportunity for low-income families through homeownership, rental assistance, workforce training, educational advancement, and health and wellness programs and services. Strategic policy objectives include:

1. Support Fair, Sustainable Homeownership, and Financial Viability;
2. Reduce Homelessness; ✪
3. Remove Lead-Based Paint Hazards and Other Health Risks from Homes; ✪
4. Enhance Rental Assistance; ✪
    - Major Initiative: Promote Economic Opportunity ✪
5. Reduce Barriers to Affordable Housing;
6. Develop EnVision Centers;
7. Support Effectiveness and Accountability in Long-Term Disaster Recovery;
8. Promote Section 3; and
9. Bolster Growth in Opportunity Zones.

✪ Indicates the Strategic Objective or Major Initiative is an APG.

II: Protect Taxpayer Funds: HUD is focused on reducing fraud, waste, and abuse of taxpayer dollars. HUD is improving processes and policies to enable it to meet reporting requirements while complying with laws and regulations related to all financial matters. Efforts focus on the strategic management objective to:

10. Improve Financial Controls through Financial Transformation.
    - Major Initiative: Modernize Grants Management

III. Streamline Operations: HUD is streamlining rules and simplifying its operations to better serve our customers. The Department is exploring ways to strengthen coordination among program offices in Headquarters and the field to ensure front-line employees are empowered to respond effectively to customer needs. Improvement activities focus on the strategic management objectives to:

11. Organize and Deliver Services More Effectively;
    - Major Initiatives: Streamline Acquisition Management
    - Cross Agency Priority Goal 6: Shift from Low-Value to High-Value Work
12. Modernize Information Technology; and
13. Reform Regulations.

APG: Reduce Homelessness

As of the third quarter of FY 2019, more than 77 communities and three states have declared an effective end to veteran homelessness; four communities have ended chronic homelessness. HUD will push to continue this movement by applying lessons learned from the work on veteran homelessness, and best practices from local communities that are rolling out innovative, cost-effective solutions on a national scale. This will include sharing knowledge across communities through several targeted technical assistance efforts, each customized to serve the target community and population.

Two technical assistance initiatives outlined in the FY 2020 APP are proceeding, which focus on persons experiencing unsheltered homelessness and helping households move from permanent supportive housing to other subsidized rental assistance.

Under HUD's FY 2018 Continuum of Care (CoC) Program, HUD awarded nearly $2.2 billion for approximately 6,800 local homeless housing and service programs across the U.S. and its territories. These funds support local programs serving individuals and families experiencing homelessness.

APG: Remove Lead-Based Paint and Other Health Risks from Homes

HUD made 9,319 housing units lead-safe through the third quarter of FY 2019. Improved homes include 3,471 units made safe through HUD Lead Hazard Control grants and 5,848 units through Lead-Safe Housing Rule compliance activities. Production represents approximately 62 percent of the FY 2019 annual goal of making 15,000 housing units lead-safe and healthy. Based upon this and past performance trends, HUD is on-track to meet its FY 2019 cumulative target to make 173,453 units lead safe since FY 2010 with HUD-provided funds.

In December 2018, the Presidential Task Force on Environmental Health Risks and Safety Risks to Children issued the Federal Lead Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts, the development of which was co-chaired by HUD, EPA, and HHS. HUD is preparing its first HUD Implementation Plan status report. The final version will be published on hud.gov/lead.

In FY 2019, HUD awarded $139 million in FY 2018 Lead-Based Paint Hazard Reduction grants. In June 2019, HUD posted the FY 2019 Notice of Funding Availability for this program. Applications were received by August 9, 2019, with awards expected to be made by September 30, 2019. As with the 2018 program, the 2019 program has multiple areas in which stakeholder relationships are emphasized. For the latest performance data on HUD's APGs, please visit HUD's APG performance page at: https://www.performance.gov/housing-and-urban-development/.

APG: Enhance Rental Assistance

HUD continued efforts to enhance and reform its rental assistance programs by providing sustainable models to empower communities to address local affordable housing needs. In FY 2019, HUD transitioned 55,373 Public Housing units to sustainable platforms as part of the Department's strategy to provide Public Housing Authorities (PHAs) access to tools for recapitalizing their housing portfolios. RAD conversions transitioned 14,438 units (or 70.1 percent) out of Public Housing. Section 18 authority was used to demolish or dispose of 5,404 units. Voluntary conversions out of Public Housing accounted for 742 units. The Department furthered PHAs' public housing repositioning efforts by streamlining guidance accompanied by targeted outreach, training, and technical assistance. FY 2019 saw the publication of the Voluntary Conversion, Required Conversion, and RAD Revision 4 notices.[3] Throughout the fiscal year HUD held numerous training sessions for PHA management, program administrators, and finance staff. Such trainings at PHAs and conferences will continue into FY 2020.

APG: Promote Economic Opportunity for HUD-Assisted Residents

Through Secretary Carson's leadership in the White House Opportunity and Revitalization Council, HUD is increasing interagency collaboration focused on improving economic opportunity and self-sufficiency for HUD-assisted residents. **For FY 2018-2019**, this APG is comprised of three components: Promote Economic Opportunity, Promote Section 3, and Develop EnVision Centers.

Promote Economic Opportunity:[4] Setting a goal to achieve self-sufficiency, and developing a way to measure the success of that goal, will allow HUD to serve more families over time with its limited resources. However, HUD does not currently have the data to quantify how many families are leaving its rental assistance programs due to improved economic circumstances. As a first step, during the summer of 2019, HUD conducted an exit survey for the Rent Reform Demonstration Program, to obtain more information about exit outcomes and inform strategies for improving administrative collection of data. HUD will analyze this data and use it to inform the next survey, of households exiting the Family Self-Sufficiency Demonstration Program, during the summer of 2020. Once HUD has fully evaluated the results of both studies, it will make recommendations for how to best track positive exits going forward.

[3] Notices can be found at the following links: Voluntary Conversion Notice: https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2019-05.pdf. Required Conversion Notice: https://www.hud.gov/sites/dfiles/PIH/documents/pih2019-10.pdf. RAD Revision 4 Notice: https://www.hud.gov/sites/dfiles/Housing/documents/H-2019-09-PIH-2019-23_RAD_Notice%20Rev4_20190905.pdf

[4] The name of this initiative has changed from Track Positive Exits to Promote Economic Opportunity to align with the updated Agency Priority Goal statement.

Promote Section 3: HUD is strengthening an existing statutory requirement that a portion of certain HUD-funded grants and contracts be used to employ HUD-assisted residents and other low-income persons. Section 3 is being strengthened through a targeted effort to stop inefficiencies in implementation at both the federal and local levels. The Section 3 Rulemaking Task Force has worked to design a cohesive and achievable revamped structure for Section 3 through collaborative internal and external engagement. Comments on the proposed Section 3 rule are being reviewed, with the final rule slated for publication in February 2020. In addition to changes in the rule, improvements in the operational structure and technology portions of Section 3 are simultaneously underway. HUD is revising the implementation of Section 3 Operations via technical assistance, webinars, and guidance from FPM, PIH, CPD, OLHCHH, and Housing.[5] HUD will make information technology enhancements for the evaluation and reporting systems to implement the new rule.

In FY 2019, HUD published the proposed Section 3 rule for comment, along with proposed benchmarks defining a presumption of compliance in creating job opportunities for low-income residents. The rule is called "Enhancing and Streamlining the Implementation of Section 3 Requirements for Creating Economic Opportunities for Low and Very Low Income Persons and Eligible Businesses." HUD is currently reviewing the comments with a target publication date for the final rule of February 2020.

Develop EnVision Centers: The EnVision Centers initiative is a demonstration that supports the creation of centralized hubs located on or near public housing developments that focus service delivery for the four key pillars of self-sufficiency: 1) economic empowerment, 2) educational advancement, 3) health and wellness, and 4) character and leadership. These Centers focus on the implementation of a collaborative, interagency working model. HUD completed operational guidance to support EnVision Center development and management in the summer of 2019.[6] As of September 2019, HUD had designated 16 EnVision Centers across all 10 of HUD's regions. HUD anticipates additional EnVision Centers opening in FY 2020 as new applicants submit action plans.

Other Secretarial Priorities[7]

Reduce Barriers to Affordable Housing: In June 2019, the President issued *Executive Order 13878*, *"Establishing the White House Council on Eliminating Barriers to Affordable Housing,"* designating the HUD Secretary as Chair of the Council.

[5] HUD's FPM, PIH, CPD, OLHCHH, and Housing have provided guidance for the revision of the implementation of Section 3 Operations.
[6] The 18 original planned EnVision Center sites are listed on HUD.gov: https://www.hud.gov/envisioncenters/locations.
[7] Additional Secretarial priorities can be found at the following link: https://www.hud.gov/program_offices/spm/appr.

In FY 2019, HUD has been working to support the implementation of *Executive Order 13878* in a number of ways. It has: reformed and expanded the internal working group; reviewed public comments from prior notices for ideas on how HUD can reduce barriers to affordable housing; drafted a Request for Information (RFI) from the public; planned roundtables with stakeholder groups and federal agencies; and procured the assistance of researchers to develop recommendations to the President on affordable housing barrier reduction.

Bolster Growth in Opportunity Zones: HUD took a comprehensive approach towards focusing program attention and resources on Opportunity Zones, throughout FY 2019. The Department assigned specialized, senior FHA underwriters to service select multifamily housing loans, residential care, and nursing home facilities in Opportunity Zones. These efforts were furthered by a reduction in FHA Mortgage Insurance loan application fees.

The fiscal year also saw the publication of the RAD Revision 4 Notice which, among various other updates, targets RAD conversions in certain Opportunity Zone for rent boosts. The Notice also allows for the prioritization of RAD conversions in Opportunity Zones located in communities with waitlists for potential residents of HUD-assisted housing. The year also saw Zones become a focus of HUD's grants management. The Department adjusted the scoring of many of its Notices of Funding Availability (NOFAs) by adding two preference points for Opportunity Zones. Furthermore, HUD updated its technical assistance for distressed cities; guidance on submitting consolidated plans and annual action plans; and Neighborhood Stabilization Program Closeout Notice to include operating information pertaining to Opportunity Zones. HUD's FY 2019 efforts closed with the launch of OpportunityZones.gov on the first day of FY 2020. HUD led the FY 2019 effort to develop this interagency website as a repository of Federal-wide Opportunity Zone projects, news, and updates. The website will continue to bolster Opportunity Zone outreach efforts into FY 2020 and beyond; as can be seen in its reception of more than 21,000 views within its first four days online.

Analysis of Financial Statements and Stewardship Information

As discussed in this document, HUD implemented several new processes to improve its internal financial controls and its financial statement close processes, which addressed several issues previously reported by the Office of Inspector General (OIG). In some instances, the extent of HUD's improvements required the OIG to conduct additional testing procedures, which required additional time for OIG to complete its audit process. Related to GNMA, GNMA fully implemented the subledger database, but the audit process and audit procedures could not be completed in a timely manner, resulting in a qualified opinion and delayed audit report.

In order to help the reader to understand the Department's financial results, position, and condition, the following analysis addresses the relevance of particular balances and amounts as well as major changes in types and/or amounts of assets, liabilities, costs, revenues, obligations, and outlays.

The principal financial statements are prepared to report the financial position and results of HUD's operations, pursuant to the requirements of *31 U.S.C §3515 (b)*. The statements are prepared from the books and records of Federal entities in accordance with Federal generally accepted accounting principles (GAAP), and the formats prescribed by the Office of Management and Budget (OMB). Reports used to monitor and control budgetary resources are prepared from the same books and records. The financial statements should be read with the realization that they are for a component of the United States Government.

This part provides a summary of HUD's:

- Financial Data
- Analysis of Financial Position
- Analysis of Off-Balance Sheet Risk

Summarized Financial Data (Dollars in Billions)		
	2019	2018 (Unaudited)
Total Assets	$217.6	$198.4
Total Liabilities	$43.1	$52.4
Net Position	$174.5	$146.0
FHA Insurance-In-Force[8]	$1,454.0	$1,427.0
Ginnie Mae Mortgage-Backed Securities Guarantees[9]	$2,092.8	$2,008.2
Other HUD Program Commitments[10]	$52.3	$49.1

In FY 2019, HUD's Consolidated Financial Statements and Notes are not shown in comparative format which is a departure from OMB *Circular A-136*. For additional information about HUD's single year presentation, refer to Note (1), Basis of Accounting and Presentation in the Financial Section 2 of the AFR.

In addition, HUD has made significant strides in improving its overall internal control over financial reporting process. HUD has worked diligently over the past year to improve the integrity of its financial data by putting into place controls through the financial management transformation initiative. Some of those controls included strengthening cross collaboration throughout HUD, establishing special purpose work groups to identify areas requiring refinement and implementing new processes to ensure financial data integrity and compliance with regulatory requirements. As a result of the improved processes put in place, HUD was able to identify correction of errors to avoid causing material misstatements to HUD's financial statements and notes. The corrections of errors are listed in Note (1), Corrections of Errors in the Financial Section 2 of the AFR.

HUD also made several changes in accounting principle this fiscal year. One change in accounting principle related to Ginnie Mae implementing *SFFAS No. 51: Insurance Programs* for its guaranty program they determined was an insurance program. For additional information about Ginnie Mae's change in accounting principles, see Note (1) Change in Accounting Principle and Note (25) in the Financial Section 2 of the AFR. The other change in accounting principle is related to HUD Proper utilizing alternative methods in establishing opening balances for Internal Use Software (IUS) as part of HUDs' General Property, Plant, and Equipment (PP&E) based on *SFFAS No. 48* and *SFFAS No. 50.* For additional information about the IUS PP&E change in accounting principles, see Note (1), Changes in Accounting Principle in the Financial Section 2 of the AFR.

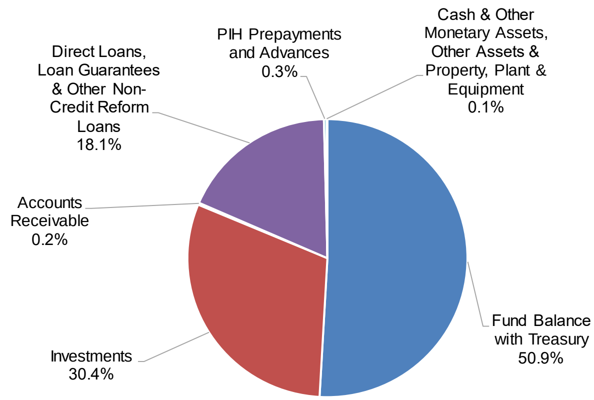
[8] See HUD AFR, Note 7(J1 and J2) – FHA Only
[9] See HUD AFR, Note 25
[10] See HUD AFR, Note 20 (Unpaid Obligations)

Analysis of Financial Statements

Assets – Major Accounts

Total Assets for FY 2019, as reported in the Consolidated Balance Sheet, are displayed in the graph below. Total Assets of $217.6 billion are comprised of Fund Balance with Treasury of $110.8 billion (50.9 percent), Investments of $66.1 billion (30.4 percent), Accounts Receivable of $0.5 billion, Direct Loans & Loan Guarantees and Other Non-Credit Reform Loan of $39.3 billion (18.1 percent), PIH Prepayments and Advances of $0.6 billion, and Cash & Other Monetary Assets, Other Assets and Property, Plant & Equipment of $0.3 billion at September 30, 2019.

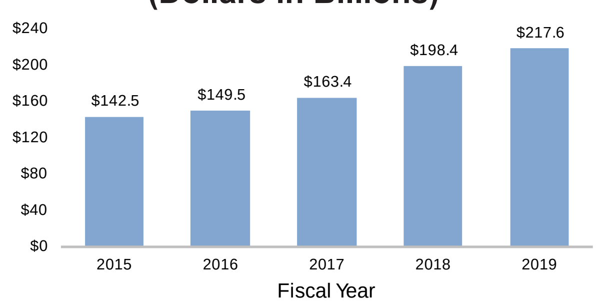
Composition of HUD Assets - FY 2019



Total Assets increased $19.2 billion (9.7 percent) from $198.4 billion at September 30, 2018. The net increase was due primarily to an increase of $23.1 billion (53.8 percent) in Investments, an increase of $9.8 billion (35.9 percent) in Direct Loans & Loan Guarantees, an increase of $0.4 billion (139.2 percent) in PIH Prepayments and Advances, being offset by a decrease of $13.4 billion (10.8 percent) in Fund Balance with Treasury, a decrease of $0.1 billion (20.8 percent) in Accounts Receivable, a decrease of $0.3 billion (10.2 percent) in Other Non-Credit Reform Loans, and a decrease of $0.3 billion (79.9 percent) in General Property, Plant and Equipment.

The chart below shows Total Assets for FY 2019 and the four preceding years. The changes and trends affecting Total Assets are discussed in the subsequent paragraphs.

Total Assets Trend (Dollars in Billions)



Fund Balance with Treasury of $110.8 billion represents HUD's aggregate amount of funds available to make authorized expenditures and pay liabilities. Fund Balance with Treasury decreased $13.4 billion due primarily to a decrease of $19.4 billion for FHA, a decrease of $0.1 billion for Housing for the Elderly and Disabled, and a decrease of $0.1 billion for Section 8, offset by an increase of $2.6 billion for Ginnie Mae, an increase of $2.3 billion for CDBG, an increase of $0.3 billion for HOME, an increase of $0.3 billion for Homeless, and an increase of $0.7 billion for Public and Indian Housing (PIH). The FHA decrease is due primarily to a net downward re-estimate, net borrowings from Treasury, insurance-related disbursements (claims) and negative subsidy disbursements, which exceed property sales, and insurance-related (HECM) collections (premiums, recoveries). Ginnie Mae's fund balance increased largely due to the monthly fee and upward re-estimate collections into the Financing account.

Investments of $66.1 billion consist primarily of investments by FHA's MMI/CMHI and by Ginnie Mae, in non-marketable, intra-governmental, Treasury securities (i.e., investments not sold in public markets). FHA's investments increased by $23.6 billion due primarily to a net downward re-estimate of $16.2 billion and negative subsidies of $6.9 billion that were transferred from the Financing Account to the Capital Reserve Account and subsequently invested. Ginnie Mae's investments decreased by $0.5 billion due to Capital Reserve account collection and interfund transfer activity (increased negative subsidy collection, decreased by upward re-estimates transfer, etc.) between the Financing and Program accounts to support operations.

Accounts Receivable of $0.5 billion primarily consists of FHA partial claims and generic debt receivables, Ginnie Mae Fees, Interest Receivables, Reimbursable cost receivables, criminal restitutions, claims to cash from the public, state and local authorities for bond refunding, and Section 8 year-end settlements.

Direct Loan and Loan Guarantees of $37.0 billion are attributed to FHA credit program receivables and HUD's support of construction and rehabilitation of low rent housing, principally for the elderly and disabled under the Section 202/811 programs. FHA's increase of $9.8 billion (37.8 percent) is primarily due to an increase in claim activity of additional HECM receivables of $9.0 billion, SF receivables of $0.9 billion in the MMI fund and $1.6 billion of additional receivables in the GI fund with an offset by an allowance for subsidy totaling $1.6 billion in the MMI fund and $0.1 billion in the GI fund. Other Non-Credit Reform Loans of $2.3 billion consists of Ginnie Mae's Mortgage Loans Held for Investment, Advances, Properties Held for Sale, and Claims Receivable. Ginnie Mae's balance decreased by $0.3 billion largely as a result of a total loan disbursement as well as normal paydown activities of the reperforming modified loans.

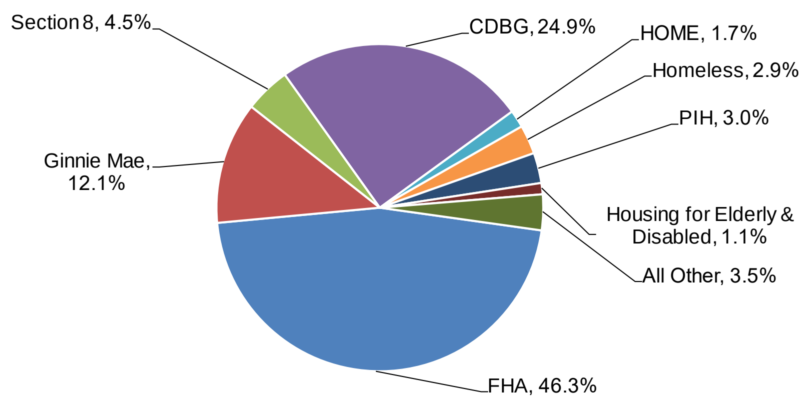
PIH Prepayments and Advances of $0.6 billion are the Department's estimates of Restricted Net Position (RNP) balances maintained by Public Housing Authorities under the Housing Choice Vouchers Program and IHBG Investments. RNP balances represent cash reserves used by Public Housing Authorities (PHAs) to cover program expenses reported by these entities as a result of recent funding shortfalls faced by the Department and additional advances to PHAs participating in the Moving to Work Program. PIH Prepayments and Advances increased by $0.4 billion primarily due to $0.2 billion increase related to the implementation of an estimation methodology to determine the portion of expenses that should be recorded as advances for the grantees that participate in the PIH IHBG programs and $0.2 billion related to RNP. For additional information refer to Note (1) and Note (10), in the Financial Section 2 of the AFR.

Other Assets (Cash & Other Monetary Assets, Other Intragovernmental Assets, and Property, Plant & Equipment) of $0.3 billion comprises primarily of IUS, furniture and fixtures, and other assets. The decrease of $0.3 billion is due primarily to a decrease in Property, Plant & Equipment (PP&E). Based on *SSFAS 48* and *SFFAS 50*, HUD utilized an alternative method in establishing opening balances for IUS as part of PP&E. For additional information, see Note (1) and Note (10), in the Financial Section 2 of the AFR

Assets – Major Programs

The chart below presents Total Assets for FY 2019 by major responsibility segment or program.

Assets by Responsibility Segment

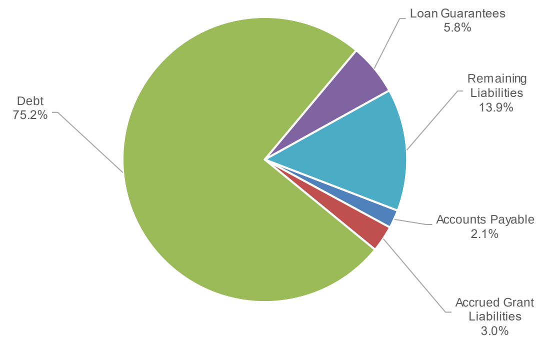


Liabilities – Major Accounts

Total Liabilities of $43.1 billion consist of Intragovernmental Debt in the amount of $32.4 billion (75.2 percent), Loan Guarantees amounting to $2.5 billion (5.8 percent), Accounts Payable of $0.9 billion (2.1 percent), Accrued Grant Liabilities of $1.3 billion (3.0 percent), and $6.0 billion of Remaining Liabilities (13.9 percent) at September 30, 2019.

Total Liabilities for FY 2019, as reported in the Consolidated Balance Sheets, are displayed in the chart below.

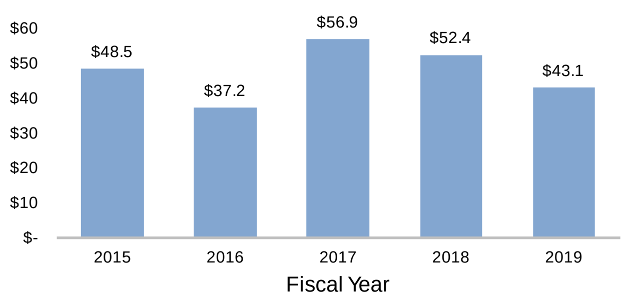
Composition of HUD Liabilities



The decrease of $9.4 billion from FY 2018 to FY 2019, is due primarily to a decrease of $16.4 billion of Loan Guarantees, a decrease of $0.2 billion of Accrued Grant Liabilities, and a decrease of $0.2 billion in Accounts Payable, offset by an increase of $5.9 billion of Intragovernmental Debt, and an increase of $1.5 billion in Remaining Liabilities

The chart below presents Total Liabilities for FY 2019 and the four preceding years. A discussion of the changes and trends impacting Total Liabilities is presented in the subsequent paragraphs.

Liabilities Trend
(Dollars in Billions)



The Loan Guarantees Liability (LGL) consists of the Liability for Loan Guarantees (LLG) related to Credit Reform loans made after October 1, 1991 and the loan loss reserves (LLR) for pre-1992 loan guarantees. LLG is comprised of the present value of anticipated cash outflows for defaults such as claim payments, premium refunds, property expense for on-hand properties, and sales expense for sold properties, less anticipated cash inflows such as premium receipts, proceeds from property sales, and principal interest on Secretary-held notes. The $16.4 billion decrease from FY 2018 to FY 2019 was due primarily to a decrease of $29.9 billion in FHA's LGL, which, in turn, was due primarily to increases in the net downward re-estimate, HECM and SF claims, HECM Notes and negative subsidy expense, and was offset by a $13.5 billion increase in Single Family (SF) Upfront, Periodic and HECM Premiums.

Debt includes Intragovernmental Debt of $32.4 billion. The Intragovernmental Debt is primarily the result of FHA's principal debt with the Treasury. FHA's $6.0 billion (22.7 percent) increase is due primarily to net borrowing in The MMI and GI financing accounts. FHA borrowed because there was not sufficient cash in the fund to cover this large outlay while still maintaining the ability to cover future claims.

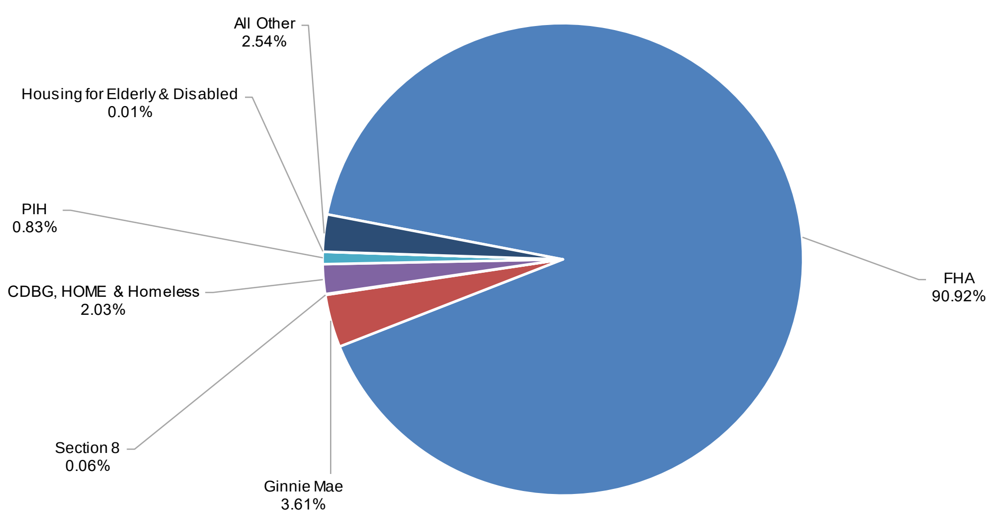
Accounts Payable consist primarily of pending grants payments.

Remaining Liabilities of $6.0 billion consist of Other Intragovernmental Liabilities, Federal Employee and Veteran Benefits, Loss Reserves, and Other Liabilities. The $6.0 billion primarily consist of $4.0 billion for FHA, $1.5 billion for Ginnie Mae, and $0.5 billion for All Others. FHA increased by $0.6 billion, which consists of a $0.4 billion increase in Other Intragovernmental Liabilities and a $0.2 billion increase in Other Liabilities with the Public. FHA's increase in Other Intragovernmental Liabilities was due primarily to an increase in the downward re-estimate for GI/SRI. FHA's increase in Other Liabilities with the Public was due primarily to an increase in Premium collection on unendorsed cases. Ginnie Mae's Other Liabilities with the Public increased by $1.0 billion. In compliance with *SFFAS 51*, Ginnie Mae was required to recognize and disclose Guarantee Obligations (GO) in excess of its Guarantee Assets (GA). After performing monthly analysis to compare the net value of the GO and Contingent MBS Loss Liability to the total GA (representing future premiums) to determine the net liability, it was determined at Year End that net liability was approximately $1.0 billion, and a change in actuarial liability was recorded.

Liabilities – Major Programs

The chart below presents Total Liabilities for FY 2019 by responsibility segment.

Liabilities by Responsibility Segment



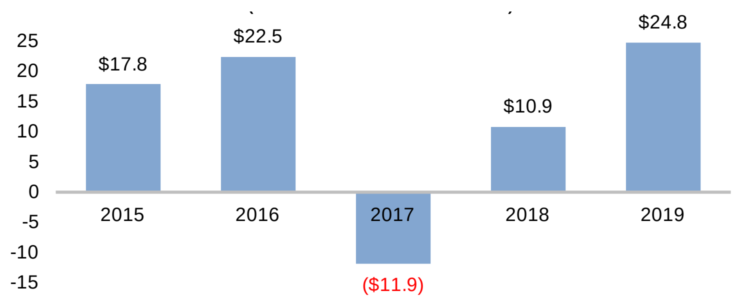
Changes in Net Position

Changes in Unexpended Appropriations, Net Cost of Operations, and Financing Sources combine to determine the Net Position at the end of the fiscal year. The elements are further discussed below. Net Position as reported in the Consolidated Statement of Changes in Net Position reflects an increase of $28.7 billion (19.7 percent) from the prior fiscal year. The net increase in Net Position is primarily attributable to a $4.0 billion increase in Unexpended Appropriations and a $24.7 billion increase in Cumulative Results of Operations.

The combined effect of HUD's Net Cost of Operations and Financing Sources resulted in an increase in Net Results of Operations of $24.8 billion during FY 2019. Net Cost of Operations decreased by $13.5 billion from the prior fiscal year and Total Financing Sources increased by $0.4 billion. FHA decreased by $16.0 billion primarily due to a decrease in the SF and HECM gross cost of $16.8 billion, offset by other gross cost increases of $0.4 billion and by decreases in earned revenue of $0.4 billion.

The chart below presents HUD's Net Change in Cumulative Results of Operations for FY 2019 and the four preceding years.

Net Change in Cumulative Results of Operations (Dollars in Billions)



Unexpended Appropriations: As shown in HUD's Statement of Changes in Net Position, HUD's Unexpended Appropriations for FY 2019 totaled $86.3 billion. The increase of $4.0 billion (4.9 percent) is due primarily to an increase of $2.5 billion in the CDBG program, and an increase of $0.7 billion in the PIH programs, with additional expenditures of $0.1 billion in Section 8, $0.3 billion in Home, and $0.4 billion for Homeless.

Financing Sources: As shown in HUD's Statement of Changes in Net Position, HUD's financing sources for FY 2019 totaled $51.8 billion. This amount is comprised primarily of $54.7 billion in Appropriations Used, offset by approximately $2.9 billion in other financing sources.

Net Cost of Operations: As reported in the Consolidated Statement of Net Cost, Net Cost of Operations amounts to $27.1 billion for FY 2019, resulting in a $13.5 billion decrease from the prior fiscal year. The decrease was due primarily to FHA's decrease of $16.0

billion, offset by an increase in Ginnie Mae of $1.0 billion, an increase of $1.0 billion in Section 8, an increase of $0.3 billion in PIH and an increase of $0.2 billion in Home.

The chart below presents HUD's Total Net Cost for FY 2018 and FY 2019 by responsibility segment.

Net Cost by Responsibility Segment - Fiscal Years 2018 and 2019 (Dollars in Billions)

*FHA and Ginnie Mae's negative net cost includes negative subsidies.

As shown in the chart, Gross Cost of Operations was primarily a result of spending of $34.8 billion in support of the Section 8 program (administered jointly by PIH, Housing, and Community Planning and Development programs). The current fiscal year change in Net Cost for the Section 8 programs was $1.0 billion (3.0 percent) more than the prior fiscal year. FHA gross costs decreased by $16.0 billion mainly due to the decrease in the SF and HECM gross cost and revenues.

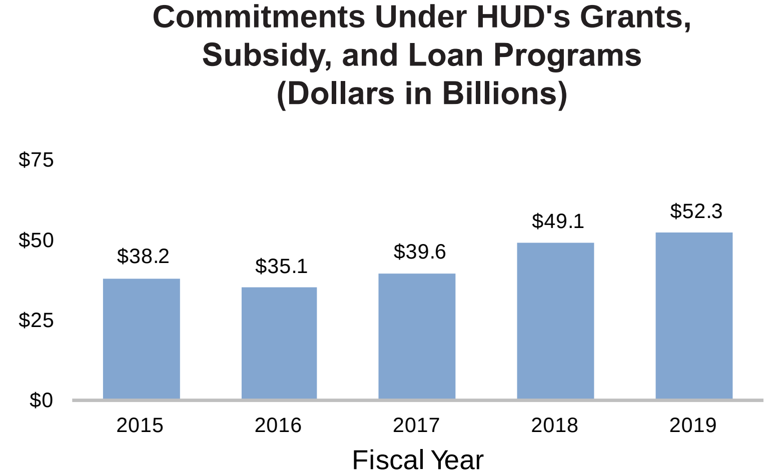
Analysis of Off-Balance-Sheet Risk

The financial risks of HUD's credit activities are due primarily to managing FHA's insurance of mortgage guarantees and Ginnie Mae's guarantees of MBS. Financial operations of these entities can be affected by large unanticipated losses from defaults by borrowers and issuers and by an inability to sell the underlying collateral for an amount sufficient to recover all costs incurred.

Contractual and Administrative Commitments

HUD's Contractual Commitments of $52.3 billion in FY 2019 represent HUD's commitment to provide funds in future periods under existing contracts for its grant, loan, and subsidy programs. Administrative Commitments (reservations) of $28.0 billion relate to specific projects, for which funds will be provided upon execution of the related contract.

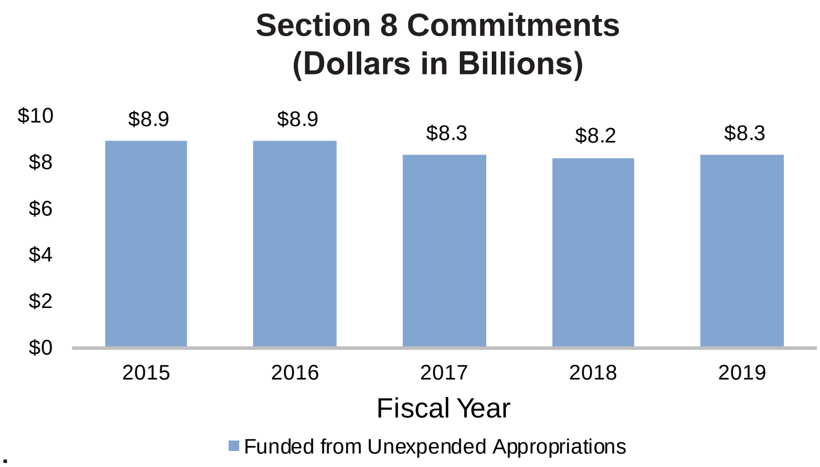
The chart below presents HUD's Contractual Commitments for FY 2019 and the four preceding years.



These commitments are funded primarily by a combination of unexpended appropriations and permanent indefinite appropriations, depending on the inception date of the contract. HUD draws on permanent indefinite budget authority to fund the current year's portion of contracts entered into prior to FY 1988 in the rental assistance program. The remaining HUD programs receive direct appropriations. Since FY 1988, HUD has appropriated funds in advance for the entire contract term in the initial year, resulting in substantial increases and sustained balances in HUD's unexpended appropriations.

Total Commitments (contractual and administrative) increased by $1.0 billion (1.2 percent) during FY 2019. The change is primarily attributable to an increase of $0.3 billion in FHA, an increase of $0.5 billion in Ginnie Mae, an increase of 0.1 billion in Section 8, and increase of $0.3 billion in HOME, an increase of $0.2 billion for Homeless, an increase of $0.5 billion for PIH, and an increase of $1.0 billion in All Other, offset by a decrease of $1.8 billion for CDBG and a decrease of $0.1 billion in Housing for the Elderly & Disabled.

The chart below presents HUD's Section 8 Contractual Commitments for FY 2019 and the four preceding years.



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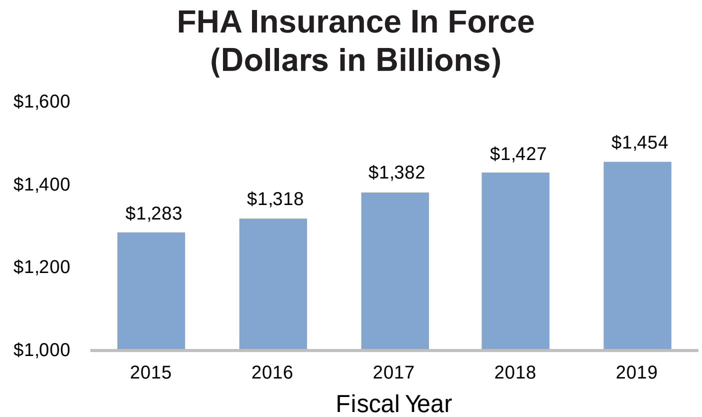
To contain the costs of future Section 8 contract renewals, HUD began converting all expiring contracts to one-year terms during FY 1996. By changing to one-year contract terms, HUD effectively reduced the annual budget authority needed from Congress.

FHA Insurance-In-Force

FHA administers a wide range of activities to make mortgage financing more accessible to the home-buying public and to increase the availability of affordable housing to families and individuals, particularly to the nation's poor and disadvantaged. FHA insures private lenders against loss on mortgages, which finance single family homes, and reverse mortgages, also referred to as HECM. FHA's Insurance-In-Force (including the Outstanding Balance of HECM loans), is $1,454.0 billion in FY 2019. This is an increase of $27.0 billion (1.9 percent) from the FY 2018 FHA Insurance-In-Force of $1,427.0 billion. The HECM insurance in force includes balances drawn by the mortgagee, interest accrued on the balances drawn, service charges, and mortgage insurance premiums.

The chart below presents FHA Insurance in Force for FY 2019 and the four preceding years.

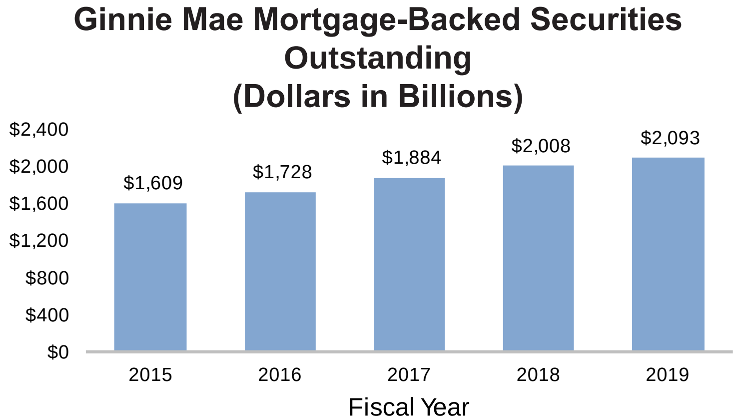


Ginnie Mae Guarantees

Ginnie Mae financial instruments with off-balance sheet risk include guarantees of Mortgage-Backed Securities (MBS) and commitments to guarantee. The securities are backed by pools of mortgage loans insured by FHA, PIH and Rural Housing Service, and guaranteed by Veterans Affairs. Ginnie Mae is exposed to credit loss in the event of non-performance by other parties to the financial instruments. The total amount of Ginnie Mae guaranteed securities outstanding at September 30, 2019 and 2018 were approximately $2,092.8 billion and $2,008.2 billion, respectively. In the event of default, the underlying mortgages serve as primary collateral, and FHA, USDA, VA and PIH insurance or guarantee indemnifies Ginnie Mae for most losses.

During the mortgage closing period and prior to granting its guaranty, Ginnie Mae enters into commitments to guarantee MBS. The commitment ends when the MBS are issued or when the commitment period expires. While Ginnie Mae's risks related to outstanding commitments are much less than outstanding securities due in part to the Federal guarantee on the underlying portfolio, Ginnie Mae is also able to mitigate risk through its ability to limit commitment authority granted to individual issuers of MBS. Outstanding commitments as of September 30, 2019 and 2018 were $115.7 billion and $124.8 billion, respectively.

The chart below presents Ginnie Mae MBS for FY 2019 and the four preceding years.



Generally, Ginnie Mae's MBS pools are diversified among issuers and geographic areas. No significant geographic concentrations of credit risk exist; however, to a limited extent, securities are concentrated among issuers. In FY 2019 and 2018, Ginnie Mae issued a total of $128.3 billion and $97.1 billion, respectively, in its multi-class securities program. The estimated outstanding balance of multiclass securities in the total MBS securities balance at September 30, 2019 and 2018 were $543.0 billion and $489.7 billion, respectively. These securities do not subject Ginnie Mae to additional credit risk beyond that assumed under the MBS program.

Multi-class securities include:

- **Real Estate Mortgage Investment Conduits (REMICs)** – REMICs are a type of multiclass mortgage-related security in which interest and principal payments from mortgages are structured into separately traded securities.
- **Stripped MBS** – Stripped MBS are securities created by "stripping" or separating the principal and interest payments from the underlying pool of mortgages into two classes of securities, with each receiving a different proportion of the principal and interest payments.
- **Platinum Securities** – A Ginnie Mae Platinum security is formed by combining Ginnie Mae's MBS pools that have uniform coupons and original terms to maturity into a single certificate.
- **Callable Trusts** – Callable Trusts allow investors to better manage repayment risk and call redemptions at negotiated prices. Call features are attractive to issuers, because they allow them to refinance their debt in the event that interest rates fluctuate.

Analysis of Systems, Controls, and Legal Compliance

We are making great progress on our financial transformation and towards resolving the material weaknesses, significant deficiencies and disclaimers noted in last year's audit report. This includes notable strides in the areas of governance, fiscal responsibility, information systems, and grant modernization. Employees throughout the Department have worked diligently to enhance our business processes, strengthen internal controls, and modernize our systems, organization, and infrastructure.

Management Assurances

Please see the FY 2019 Annual Assurance Statement on page 34.

Material Weaknesses Summary

Throughout FY 2019, HUD worked towards remediating open audit recommendations and developing, executing, and monitoring corrective action strategies. Significant progress was made remediating material weaknesses relating to Internal Controls over Reporting, Compliance with accounting standards, IT systems, Asset balances related to non-pooled loans; and, FHA's modeling process.

The Department strives to continue building upon these achievements and is dedicated to fully remediating material weaknesses remaining in FY 2020 and summarized below:

1. Accounting Standards

- To address the impact of historical "first-in, first-out" (FIFO) accounting practices, HUD conducted an analysis of the transaction data to identify approaches that would potentially allow the Department to shorten its financial reporting timeline. We determined available data does not allow us to retroactively apply corrections to obligations prior to FY 2015. The financial statements will continue to contain the impacts of FIFO on assets prior to FY 2015 for another two to three years but are no longer material to the financial statements. This matter was correct for all obligations in FY 2016 and beyond.
- HUD is systematically establishing and updating internal controls and policies and procedures to resolve findings and properly account for and adequately support its budgetary and proprietary accounts. For example, HUD has taken steps to better account for its PP&E by updating its policies and procedures, strengthening internal controls, and remediating historical balances for each fixed asset category. As a result, HUD's remaining PP&E balance as of September 30, 2019, conformed to our new accounting policy and is immaterial to the financial statements.

- In FY 2019, HUD implemented corrective actions related to its CPD grant accrual estimate and validation process and expanded its validation methods for CPD accrued grant liabilities estimates, including providing training to grantees, requesting supporting documentation for reported accruals, validating reported advances, and conducting direct follow-up with grantees to validate reported balances. These enhancements help strengthen the effectiveness of key processes and facilitate timely and accurate financial reporting.
- HUD implemented corrective actions related to Accounts Receivable balance, including 1) validating receivable balances, 2) recording an appropriate allowance, and 3) making appropriate write-offs.
- HUD has taken steps towards resolving the material weakness related to the accounting treatment of funds disbursed to Indian Housing Block Grant (IHBG) grantees for investment as authorized by *section 204(b)* of the *Native American Housing Assistance and Self Determination Act of 1996*. Data used to prepare estimates has been validated, and HUD is working to improve the accuracy of data reported.
- HUD improved its method of calculating PIH Housing Choice Voucher Prepayments. Previously, the calculation erroneously included all Moving to Work (MTW) administrative expenses, while leaving out other applicable MTW expenses. In FY 2019, HUD corrected this calculation and refined the process for future estimates.
- HUD is implementing a new cash management system to be completed in FY 2020 that will automate our cash reconciliation process. The automation will use more timely tenant level data maintained in the PIH Information Center (PIC) and allow cash reconciliations and offsets/additional payments to occur automatically on a monthly basis. These factors should reduce the receivable and payables substantially because of the immediate offset (collection) or payment of additional funds.

2. Asset Balances Related to Non-pooled Loans

HUD has fully implemented its accounts system related to Ginnie Mae's non-pooled loan assets during FY 2019. The Department will continue to work with OIG to provide further support for OIG's understanding of Ginnie Mae's policies, procedures, governance structure, and technology to aid in the OIG's audit process.

3. Financial Information Systems

HUD OCFO has made tremendous progress in improving our financial internal controls. In addition to implementing new shared service systems, we closed 17 OIG audit recommendations related to financial system weaknesses, resulting in improved financial data integrity through updating and establishing procedures and processes. HUD continues to take steps to modernize its financial management systems and to decommission legacy systems. The following are key improvements that OCFO made during FY 2019 to improve financial systems' functionality and internal controls:

- Achieved 100 percent *DATA Act* compliance and established a department-wide Data Quality Plan.
- Participated in two assessments of OMB *Circular A-123, Appendix A*; Financial Information Data Completeness and Complimentary User Entity Controls and achieved 100 percent compliance.
- Implemented the Oracle Business Intelligence (OBI) financial reporting tool to replace the legacy Oracle Discoverer system so that HUD staff have a newer tool to perform data analysis for their work.
- Updated the Continuity of Operations (COOP) Plan to prepare for future disasters, prevent disruptions to financial operations, and ensure that financial systems are available to HUD staff so that HUD's mission can still be accomplished in the event of a disaster.
- Completed user recertification for six shared services and seven OCFO systems to limit access on a need to know basis, keep costs low, and ensure that unauthorized users cannot access the data.
- Lowered the risk of system breaches and protected personally identifiable information by updating privacy documents for the Line of Credit Control System (LOCCS), HUD Central Accounting and Program System (HUDCAPS), and Loan Accounting System (LAS) as part of these systems' authorization to operate.
- Implemented SmartPay 3, which replaced SmartPay 2 for processing all CitiDirect government purchase card requirements.

In addition to closing out audit findings and recommendations, HUD has continued to work with ARC to migrate and implement new technologies to provide better services to HUD's internal and external customers. This includes implementing the Oracle Fixed Asset module, using the OneStream Budget Formulation service, and moving towards the OneStream Cost Accounting system.

HUD also made significant improvements on its existing systems and worked toward decommissioning legacy systems:

- **Program Accounting System (PAS)**: HUD is on target to migrate PAS functionality into LOCCS during FY 2020. HUD will achieve cost savings by decommissioning PAS. HUD will be able to put the funds into better use.
- **HUD Consolidated Financial Statement System (HCFSS)**: HUD worked diligently to successfully decommission HCFSS, achieving cost savings and allowing HUD to put taxpayer dollars to better use.
- **EZBudget and Total Estimated and Allocation Mechanism (TEAM) Systems Decommissioning**: To lower additional operations and maintenance costs, HUD is in the process of decommissioning EZBudget and TEAM systems.

To continue bringing its financial systems into compliance, HUD plans to modernize its IT systems through the OMB Technology Modernization Fund and GSA/HUD Centers of Excellence initiatives during FY 2020.

This includes migrating LOCCS to the cloud off the Unisys mainframe, and to examining its technology infrastructure and operating procedures to identify needed upgrades and opportunities for improvement.

HUD performed an assessment of the organization's FFMIA compliance with Section 803(a): Federal financial management systems requirements, applicable Federal accounting standards promulgated by FASAB, and the USSGL at the transaction level. Financial management systems include both financial and financially related (or mixed) systems. As of September 30, 2019, HUD had determined that 25 out of 33 of its financial management systems are substantially compliant with Section 803(a) of FFMIA.

These systems comply with federal financial management systems requirements, applicable federal accounting standards, and the USSGL at the transaction level. However, per the OIG, HUD's overall financial management systems did not comply with the FFMIA, and do not comply with federal financial management systems requirements, applicable federal accounting standards, and the USSGL at the transaction level. Please see the following section for additional detail.

1. **Federal Asset Management Enterprise System (FAMES), Office of Administration**: A remediation plan has been established to resolve PP&E weaknesses identified by HUD OIG.
2. **Integrated Disbursement Information System (IDIS), CPD**: CPD made necessary modifications to the grant system to align the obligation and disbursement transactions for grants issued beginning in FY 2015 and forward on a grant-specific basis. However, a feasible solution was not found to address the pre-FY 2015 historical transactions, which used a FIFO disbursement method to liquidate obligations. Therefore, the balances are material to the Department's financial statements and the material weakness will remain until the balances become immaterial. As a result, this weakness will be resolved within two to three years.
3. **Disaster Recovery Grant Reporting System (DRGR), CPD**: CPD is working on resolving OIG Audit Report 2017-FO-0003 Recommendation 8E to bring DRGR back into compliance with FFMIA. It is anticipated that DRGR will be compliant in the coming year.
4. **New Core Interface Solution (NCIS), OCFO**: In FY 2018, OCFO resolved the interface weaknesses, and in FY 2019, OCFO resolved the remaining default value data conversion issues.
5. **Single Family Mortgage Asset Recovery Technology System (SMART), Office of Housing**: HUD determined that SMART is non-compliant with FFMIA due to open audit recommendations related to significant delays in billing noncompliant mortgagees for partial claims for which the promissory note was not provided within 60 days. Housing is working on resolving the one remaining recommendation to bring SMART back into compliance with FFMIA by March 31, 2020.

6. **Tenant Rental Assistance Certification System (TRACS), Office of Housing**: Housing has established a remediation plan and is working to bring TRACS back into compliance.
7. **Ginnie Mae Financial and Accounting System (GFAS), Ginnie Mae**: Ginnie Mae stated in their June 30, 2018 Statement of No Assurance memo that they did not provide assurance over internal control over financial reporting and financial management systems, given weaknesses affecting the overall financial management system as indicated by the disclaimer of opinion on the FY 2014–FY 2017 financial statements and related material weaknesses. The financial management system covers the business processes and controls that affect the activity being recorded within the system. Assuming no other relevant material weaknesses are identified, Ginnie Mae will be able to provide FFMIA assurance for GFAS once the four previously discussed material weaknesses are remediated.
8. **Integrated Pool Management System (IPMS), Ginnie Mae**: Ginnie Mae has established Management Decisions to close these weaknesses in the coming year.

Other Management Information, Assurances, and Legal Compliance

Anti-Deficiency Act (ADA)

The *ADA* is a funds control statute that was enacted by Congress to prevent the incurring of obligations or the making of expenditures in advance or in excess of amounts appropriated, apportioned, or allotted. The Department, in coordination with OMB, has in the past several years continued a major effort to examine and strengthen its financial controls across all offices and programs in an effort to prevent ADA violations. This entailed a comprehensive review of HUD's financial management practices, communication protocols, and written guidance. The Department updated its funds control policy by issuing the HUD Administrative Control of Funds Policies, 1830.2, REV-6 (Funds Control Handbook) in fiscal year 2017 along with the HUD Administrative Control of Funds Procedures for Salaries and Expenses which have been further updated during the past few years.

Debt Collection Improvement Act of 1996 (DCIA)

The *DCIA*, as amended, requires that Federal agencies refer delinquent debts to Treasury within 120 days and take all appropriate steps prior to discharging debts. HUD and Ginnie Mae did not always follow applicable requirements for establishing and collecting debts, which resulted in noncompliance with the *DCIA*. OCFO plans to commence a full end-to-end analysis of its debt management to strengthen controls and ensure compliance with Debt Collection statutes and regulations.

DATA Act

On May 9, 2014, the *DATA Act* was signed into law with the objective of making Federal spending more accessible, transparent, and standardized. The *DATA Act* amended the *Federal Funding Accountability and Transparency Act of 2006* (FFATA). In addition to reporting financial assistance data monthly, HUD must submit seven files to Treasury's Broker system on a quarterly basis, integrating budget, financial, procurement, and financial assistance data for publication on USASpending.gov.

During 1st quarter 2019 (Treasury *DATA Act* submission deadline of November 14, 2018), HUD achieved full reporting compliance, with the inclusion of Ginnie Mae and loan programs from FHA and HUD proper.

Forward-Looking Information

Numerous external factors shape HUD's operating environment. Understanding their influence is essential for mitigating risk and achieving performance objectives. These external factors include funding levels, economic conditions, financial markets, tax codes, and other federal, state and local conditions. HUD's FY 2018-2022 Strategic Plan responds to these factors by reimagining the way HUD works. The plan's reforms include careful use of evidence, employee empowerment, clear communication, and enhanced controls that are all crucial to more efficient and effective mission delivery.

Constrained federal funding levels affected most HUD programs during FY 2019 and are likely to continue in the foreseeable future. Financial constraints increase demand by PHAs for administrative and operational flexibility. HUD is implementing such flexibilities by supporting PHA access to private capital through the Rental Assistance Demonstration; by working toward an evidence-based expansion of housing agencies participating in the MTW program; and by experimentally testing whether rent reforms can strengthen tenant self-sufficiency incentives while reducing the administrative burden on housing providers.

In the second quarter of calendar year (CY) 2019, the national homeownership rate was 64.2 percent, unchanged from a year earlier. Purchases of new single-family homes were down 4 percent and of existing homes were down 1 percent from a year earlier. With the increasing demand, prices of owner-occupied homes as measured by the Case-Shiller index were up 2.6 percent from a year earlier. Rates of mortgage delinquency, defaults, and foreclosure starts have diminished to pre-recession levels.[11]

By August 2019, the unemployment rate had improved to 3.7 percent, down from 3.9 percent a year earlier, and the employment-to-population ratio had increased by 0.5 point (from September 2017) to 60.9 percent.[12] Such employment and labor force participation gains should facilitate further gains in household incomes, building on the 2.9 percent increase in CY 2017 median income to $63,179 in CY 2018.[13] The official poverty rate declined 0.5 percentage points from 12.3 percent in CY 2017 to 11.8 percent in CY 2018.[14] The improving employment and income situation is a positive factor for increasing economic opportunity for HUD-assisted renters and for first-time homebuying.

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[11] HUD PD&R. 2019. "Housing Market Indicators Monthly Update, June 2019." https://www.huduser.gov/portal/sites/default/files/pdf/Housing-Market-Indicators-Report-June-2019.pdf.
[12] Values as of August. Bureau of Labor Statistics. "Employment Situation Summary Table A. Household data, seasonally adjusted," August 2018. http://www.bls.gov/news.release/empsit.a.htm
[13] U.S. Census Bureau. 2018. Table HINC-01, "Selected Characteristics of Households by Total Money Income." https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-hinc/hinc-01.html.
[14] U.S. Census Bureau. 2019. "Income and Poverty in the United States, 2018." https://www.census.gov/library/publications/2019/demo/p60-266.html

The overall picture for homebuying is mixed, and the national homeownership rate fell to 64.1 percent in the second quarter of CY 2019 from 64.3 percent a year earlier. Mortgage interest rates declined in the first half of CY 2019, and gains in median income helped offset increases in median home prices so the Homeownership Affordability Index increased by 6.3 points to 151.5 from a year earlier. Student loan debt, however, poses a significant constraint on first-time homebuying by younger adults; there is $1.5 trillion of student debt outstanding, compared with $9.4 trillion of mortgage debt.[15] As a result, sales to first-time buyers increased slightly in CY 2019, and accounted for only 33 percent of sales transactions in the first half of CY 2019, remaining significantly below the historic norm of 39 percent.[16]

The housing construction in the second quarter of CY 2019 held at an annual rate of 1.26 million housing starts, about the same as a year earlier. Such construction is about on pace with the household formation rate of 0.9 percent observed in CY 2016 and CY 2017 and annual demolitions of several hundred thousand obsolete units. Multifamily housing starts at an annual rate of 396,000 units in the second quarter were up 13 percent from the previous year, and accounted for 31 percent of total starts, above the long-run average of 24 percent.[17] Despite these modest increases in multifamily development, the rental market remains tight. The rental vacancy rate of 6.8 percent in June 2019 was unchanged from a year earlier and only 0.1 point above the record low of CY 2016.[18]

HUD's rental affordability index shows that rent increases continue to outpace income growth, eroding the affordability of renting a home. The index relates median renter household income to the qualifying income for the median-priced rental unit. The rental affordability index worsened from 108.3 percent in second quarter of CY 2018 to 106.6 in the second quarter of CY 2019. The index implies that in CY 2019, the median renter has less than 7 percent more income than the minimum necessary to qualify, at 30 percent of income, for the median-priced rental unit.

The 44 percent of renter households that have very low incomes continue to face a substantial gap in market supply of affordable housing. The most recent available data show that in CY 2017, only 59.0 affordable rental units were available per 100 very low-income renters, down from 65.2 in CY 2013.[19] Such unmet demand for affordable housing puts pressure on waiting lists for public and assisted housing, fair market rents, and HUD's subsidy costs, and increases the difficulty that voucher recipients face in finding a suitable unit.

[15] New York Federal Reserve Bank. 2019. "Quarterly Report on Household Debt and Credit, 2019 Q2." https://www.newyorkfed.org/medialibrary/interactives/householdcredit/data/pdf/HHDC_2019Q2.pdf
[16] HUD PD&R. 2018. "National Housing Market Summary, 2nd Quarter, 2019."
[17] *Ibid*.
[18] Census Bureau. Historical Table 1. "Quarterly Rental Vacancy Rates: 1956 to Present."
[19] HUD PD&R. Forthcoming. "Worst Case Housing Needs: 2019 Report to Congress."

Shortages of affordable housing also contribute to doubling up and homelessness, especially for families. Homeless veterans for many years were overrepresented in the homeless population, especially among chronically homeless individuals, but decreased by 5 percent between CY 2017 and CY 2018 and by 48 percent since CY 2009. Progress in reducing the number of homeless people found in families with children has been more limited, with a 23 percent reduction from CY 2007 to CY 2018. Nevertheless, the overall number of homeless people increased by 0.3 percent between CY 2017 and CY 2018 as the affordable housing shortage continues to pressure disadvantaged populations.[20]

Under the National Disaster Recovery Framework, HUD has both coordinating and primary roles in the housing recovery function, a primary role in the community planning and capacity building function, and supporting roles in several other disaster recovery functions. Over the longer term, new disasters and emerging national needs such as coastal development and insufficient flood insurance have potential to create new needs and require significant changes in the Department's program operations. Appropriations for the CDBG-DR program have increased to a significant fraction of HUD's resources in recent years. In addition, severe hurricanes have demonstrated their capacity to significantly change housing and employment markets on a regional basis for months or years, for example by increasing mortgage delinquencies and foreclosures. To counteract such risks, HUD has increasingly reshaped disaster recovery grant-making to encompass major disaster mitigation components for regions proven vulnerable by recent natural disasters.

HUD is continuing to integrate evidence and research in operations and policy, consistent with multiple governmental initiatives, and as embodied in the FY 2018-2022 Strategic Plan. Major components of evidence-based policy efforts include the Office of Policy Development and Research's demonstration and evaluation program; engaging internal and external partners to address cross-cutting policy issues through research; the leveraging of HUD's data infrastructure by linking administrative data with surveys and other external data sources; the continuing integration of evidence into business operations; and the establishment of an Office of Innovation to test and validate solutions to state, local, and federal housing and community development problems in the domains of building technology, internal operations, and open innovation.

As HUD moves forward in implementing the Strategic Plan, implementation of the *Foundations for Evidence-Based Policymaking* of 2018 (*Evidence Act*) will play an important complementary role. As required by the *Evidence Act*, HUD already has named a new Evaluation Officer, Chief Data Officer, and Statistical Official. The Department will supplement its updated evidence-building plan, the Research Roadmap, with new annual evaluation plans, better use of data assets, and quadrennial agency-wide Capacity Assessments to strengthen the generation and use of evidence for more effective policymaking.

[20] HUD CPD. 2018. "2018 Annual Homeless Assessment Report (AHAR) to Congress—Part 1: Point-in-Time Estimates of Homelessness."

Management Assurances

The Department of Housing and Urban Development's (HUD) management is responsible for managing risks and maintaining effective internal control over operations to meet the objectives of Sections 2 and 4 of the *Federal Managers' Financial Integrity Act of 1982 (FMFIA)*. HUD conducted its annual assessment of risk and internal control over operations in accordance with OMB *Circular No. A-123, Management's Responsibility for Enterprise Risk Management and Internal Control.*

Based on the results of this assessment, and the successes of the on-going financial transformation program, the Department can provide a modified assurance that, taken as a whole, its internal controls over operations, reporting and compliance were operating effectively as of September 30, 2019, except for one existing material weakness noted by the Inspector General.

The *Federal Financial Management Improvement Act of 1996 (FFMIA)* requires agencies to implement and maintain financial management systems that are substantially in compliance with Federal financial management systems requirements, Federal accounting standards, and the United States Standard General Ledger at the transaction level. In FY 2019, HUD remained focused on remediating audit deficiencies by utilizing resources normally available for assessing effectiveness of internal controls. Through these successful efforts, and by leveraging emerging technologies such as robotic process automation and data analytics, HUD designed and implemented new processes with a sharp internal controls focus.

HUD had one remaining material weakness at the end of FY 2019. Specifically, in a few instances HUD could not fully comply with Generally Accepted Accounting Principles due to past practices, and certain financial estimates required greater depth and additional time for audit. HUD will continue the momentum established in FY 2019 to expand its internal control assessment and remediation efforts in support of the FY 2020 assurance statement.

2-7-20

Benjamin S. Carson Sr.
Secretary

February 7, 2020

2

Financial Section

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Message from the Chief Financial Officer

February 7, 2020

Since joining the organization in early 2018, I have worked closely with my leadership team and the HUD workforce to implement many improvements that were needed to restore sound financial management and stability throughout the department. I am pleased to report that we have made tremendous progress and achieved some very significant milestones and innovation breakthroughs in Fiscal Year (FY) 2019. If we stay the course, we are on track to achieve our goal of remediating our financial statement material weakness in the next one to two years. The improvements we made in people, processes, and technology during FY 2019 have significantly strengthened our financial operations, our governance structures and our employee engagement.

In the face of budget constraints and with limited resources to fully deliver our mission critical activities, my leadership team embarked on a journey to financial excellence through intelligent automation. We successfully applied Robotics Process Automation, Artificial Intelligence and leveraged data analytics to improve several processes. This work has triggered a cultural change, sparked a fire for automation and process improvements, and laid the foundation for financial transformation at HUD. The processes we successfully automated this year are estimated to save the Department several thousand hours annually. Through these efforts, work that was manual, mundane and transactional in nature has been transformed into more efficient and effective processes that allow our CFO team to perform activities that add value. As we continue to automate our processes, I anticipate we will save tens of thousands of hours that will translate to employees performing more meaningful, higher-value work.

HUD has engaged with the White House’s Office of American Innovations to modernize our business processes. We have been actively engaged in the federal Centers of Excellence initiative to assist HUD in modernizing our systems and processes, with my office focusing on data analytics. This effort uses business and intelligent automation to ensure our data is high quality, and reconstructed to dashboard technology, to enable our leaders to make better operational decisions.

Through the work of our Agency-Wide Integrity Task Force, which I chair, we have reduced risk and improved areas that had operational deficiencies. This task force, composed of key HUD leaders who oversee project management teams, was tasked with improving areas with identified deficiencies, and has made great strides in aligning the policies, processes, and people responsible for financial reporting. This vital work is improving our financial position while protecting taxpayer funds.

Below is a summary of FY 2019 key accomplishments, which are more fully described in the FY 2019 OCFO Accomplishments section of this report:

- Improved and streamlined the Financial Statement Close Process
- Implemented Robotic Process Automation and Artificial Intelligence technologies to improve and streamline several processes
- Fully implemented processes and controls related to non-pooled assets at GNMA
- Implemented an Agency-wide Data Analytics Strategy
- Improved CDBG-DR financial monitoring controls
- Implemented a robust Enterprise Risk Management process
- AWITF is improving governance and business processes
- Updated 60 Policy and Procedures Statements
- Achieved 100 percent compliance with the *Data Act*
- Eliminated the need for OIG financial statement audit disclaimers
- Reduced material weaknesses
- Reduced agency-wide open audit findings by over 20 percent
- OCFO is leading HUD with an EVS score of 79 percent, up from 62 percent in 2017.

We are building agency-wide positive and collaborative relationships across the department and with our Office of Inspector General (OIG). I believe a productive working relationship with the OIG and a sound financial statement audit approach are critical to our success in addressing and resolving our outstanding audit findings. The OIG's audit report reflects the significant improvements we have made in the financial controls over the last two years. We eliminated all disclaimers in the consolidated audit report and have reduced our material weaknesses from nine in 2017 to one in 2019.

While more opportunities remain to transform how we do business and fully restore sound financial management, we are well on our way to financial excellence. I expect we may uncover additional challenges from past practices as we continue to strengthen our operations and control environment. I remain committed to working with HUD leadership and the workforce to address and fix these deficiencies as we find them. In closing, I am proud of the work my office has accomplished this year and am confident that we will continue to build upon our successes in FY 2020 and the years that follow.

Sincerely,

Irving L. Dennis
Chief Financial Officer

Financial Statements

As discussed in this document, HUD implemented several new processes to improve its internal financial controls and its financial statement close processes, which addressed several issues previously reported by the Office of Inspector General (OIG). In some instances, the extent of HUD's improvements required the OIG to conduct additional testing procedures, which required additional time for OIG to complete its audit process. Related to GNMA, GNMA fully implemented the subledger database, but the audit process and audit procedures could not be completed in a timely manner, resulting in a qualified opinion and delayed audit report.

Introduction

The principal financial statements have been prepared to report the financial position and results of operations of HUD, pursuant to the requirements of *31 U.S.C. §3515(b)*. While the statements have been prepared from HUD's books and records in accordance with GAAP for Federal entities and the formats prescribed by the OMB, the statements are in addition to the financial reports used to monitor and control budgetary resources, which are prepared from the same books and records. The statements should be read with the realization that they are for a component of the U.S. Government, a sovereign entity.

The following financial statements are presented:

The **Consolidated BS**, as of September 30, 2019, which presents those resources owned or managed by HUD that are available to provide future economic benefits (assets), amounts owed by HUD that will require payments from those resources or future resources (liabilities), and residual amounts retained by HUD comprising the difference (net position).

The **Consolidated SNC**, which presents the net cost of HUD operations for the fiscal year ended September 30, 2019. HUD's net cost of operations includes the gross costs incurred by HUD less any exchange revenue earned from HUD activities.

The **Consolidated SCNP**, which presents the change in HUD's net position resulting from the net cost of HUD operations, budgetary financing sources other than exchange revenues, and other financing sources for the fiscal year ended September 30, 2019.

The **Combined Statement of Budgetary Resources (SBR)**, which presents the budgetary resources available to HUD during FY 2019, the status of these resources and the outlay of budgetary resources for the fiscal year ended September 30, 2019.

The **Notes to the Financial Statements** provide important disclosures and details related to information reported on the statements.

Financial Statements
U.S. Department of Housing and Urban Development
Consolidated Balance Sheet
As of September 30, 2019
(Dollars in Millions)

Assets:		
Intragovernmental:		
Fund Balance with Treasury (Note 3)	$	110,743
Investments (Note 5)		66,120
Other Assets (Note 11)		33
Total Intragovernmental	**$**	**176,896**
Cash and Other Monetary Assets (Note 4)	$	126
Investments (Note 5)		6
Accounts Receivable, Net (Note 6)		513
Direct Loans and Loan Guarantees (Note 7)		37,012
Other Non-Credit Reform Loans (Note 8)		2,313
General Property, Plant, and Equipment, Net (Note 9)		85
PIH Prepayments and Advances (Note 10)		629
Total Assets	**$**	**217,580**
Liabilities (Note 12):		
Intragovernmental:		
Accounts Payable	$	67
Debt (Note 13)		32,384
Other Liabilities (Note 15)		3,528
Total Intragovernmental Liabilities	**$**	**35,979**
Accounts Payable	$	825
Accrued Grant Liabilities		1,288
Loan Guarantee Liability (Note 7)		2,514
Debt Held by the Public (Note 13)		2
Federal Employee and Veteran Benefits (Note 14)		60
Other Liabilities (Note 15)		2,389
Total Liabilities	**$**	**43,057**
Commitments and Contingencies (Note 16)	$	18
Net Position:		
Unexpended Appropriations - Funds from Dedicated Collections (Combined Totals) (Note 17)	$	-
Unexpended Appropriations - All Other Funds (Combined Totals)		86,250
Cumulative Results of Operations - Funds From Dedicated Collections (Combined Totals) (Note 17)		25,859
Cumulative Results of Operations - All Other Funds (Combined Totals)		62,414
Total Net Position - Funds from Dedicated Collections (Combined Totals) (Note 17)	**$**	**25,859**
Total Net Position - All Other Funds (Combined Totals)	**$**	**148,664**
Total Net Position	**$**	**174,523**
Total Liabilities and Net Position	**$**	**217,580**

The accompanying notes are an integral part of these statements.

Financial Statements
U.S. Department of Housing and Urban Development
Consolidated Statement Of Net Cost
As of September 30, 2019
(Dollars in Millions)

COSTS		
Federal Housing Administration (FHA)		
Gross Costs	$	(23,201)
Less: Earned Revenue		(1,636)
Net Program Costs	**$**	**(24,837)**
Government National Mortgage Association (GNMA)		
Gross Costs	$	1,260
Less: Earned Revenue		(1,946)
Net Program Costs	**$**	**(686)**
Section 8 Rental Assistance		
Gross Costs	$	34,813
Less: Earned Revenue		-
Net Program Costs	**$**	**34,813**
Public and Indian Housing Loans and Grants (PIH)		
Gross Costs	$	2,856
Less: Earned Revenue		-
Net Program Costs	**$**	**2,856**
Homeless Assistance Grants		
Gross Costs	$	2,147
Less: Earned Revenue		(3)
Net Program Costs	**$**	**2,144**
Housing for the Elderly and Disabled		
Gross Costs	$	942
Less: Earned Revenue		(62)
Net Program Costs	**$**	**880**
Community Development Block Grants (CDBG)		
Gross Costs	$	5,088
Less: Earned Revenue		-
Net Program Costs	**$**	**5,088**
HOME		
Gross Costs	$	961
Less: Earned Revenue		-
Net Program Costs	**$**	**961**
All Other		
Gross Costs	$	5,692
Less: Earned Revenue		(29)
Net Program Costs	**$**	**5,663**
Costs not Assigned to Programs	$	212
Consolidated		
Gross Costs	$	30,770
Less: Earned Revenue		(3,676)
Net Cost of Operations	**$**	**27,094**

The accompanying notes are an integral part of these statements.

Financial Statements
U.S. Department of Housing and Urban Development
Combining Statement Of Changes In Net Position
As of September 30, 2019
(Dollars in Millions)

	Funds From Dedicated Collections (Combined Totals)	All Other Funds (Combined Totals)	Eliminations	Consolidated Total
Unexpended Appropriations:				
Beginning Balances	$ (308)	$ 82,005	$ -	$ 81,697
Adjustments:				
Corrections of Errors	308	267	-	575
Beginning Balance, as Adjusted	**$ -**	**$ 82,272**	**$ -**	**$ 82,272**
Budgetary Financing Sources:				
Appropriations Received	$ -	$ 59,193	$ -	$ 59,193
Other Adjustments	-	(565)	-	(565)
Appropriations Used	-	(54,650)	-	(54,650)
Total Budgetary Financing Sources	**$ -**	**$ 3,978**	**$ -**	**$ 3,978**
Total Unexpended Appropriations	**$ -**	**$ 86,250**	**$ -**	**$ 86,250**
Cumulative Results from Operations:				
Beginning Balances	$ 25,571	$ 38,683	$ -	$ 64,254
Changes in Accounting Principles	50	(332)	-	(282)
Corrections of Errors	(458)	7	-	(451)
Beginning Balances, as Adjusted	**$ 25,163**	**$ 38,358**	**$ -**	**$ 63,521**
Budgetary Financing Sources:				
Other Adjustments	$ -	$ (10)	$ -	$ (10)
Appropriations Used	-	54,650	-	54,650
Nonexchange Revenue	3	12	-	15
Transfers-in/out without Reimbursement	-	(414)	409	(5)
Other Financing Sources (Nonexchange):				
Transfers-in/out without Reimbursement	-	409	(409)	-
Imputed Financing	2	78	-	80
Other	(3)	(2,881)	-	(2,884)
Total Financing Sources	**$ 2**	**$ 51,844**	**$ -**	**$ 51,846**
Net Cost of Operations	**$ 694**	**$ (27,788)**	**$ -**	**$ (27,094)**
Net Change	**$ 696**	**$ 24,056**	**$ -**	**$ 24,752**
Cumulative Results of Operations	**$ 25,859**	**$ 62,414**	**$ -**	**$ 88,273**
Net Position	**$ 25,859**	**$ 148,664**	**$ -**	**$ 174,523**

The accompanying notes are an integral part of these statements.

Financial Statements
U.S. Department of Housing and Urban Development
Combined Statement of Budgetary Resources
As of September 30, 2019
(Dollars in Millions)

	Budgetary	Non-Budgetary Credit Reform Financing Accounts
Budgetary Resources:		
Unobligated Balance From Prior Year Budget Authority, Net	$ 81,543	$ 33,079
Appropriations (discretionary and mandatory)	59,445	-
Borrowing Authority (discretionary and mandatory)	-	11,479
Spending Authority from Offsetting Collections	28,045	21,547
Total Budgetary Resources	**$ 169,033**	**$ 66,105**
Status of Budgetary Resources:		
New Obligations and Upward Adjustments (Total) (Note 21)	$ 62,653	$ 50,794
Unobligated Balance, End of Year:		
Apportioned, Unexpired Accounts	34,835	13,389
Unapportioned, Unexpired Accounts	70,647	1,922
Unexpired Unobligated Balance, End of Year	**$ 105,482**	**$ 15,311**
Expired Unobligated Balance, End of Year	$ 898	$ -
Unobligated Balance, End of Year (Total)	**$ 106,380**	**$ 15,311**
Total Budgetary Resources	**$ 169,033**	**$ 66,105**
Outlays, Net:		
Outlays, Net (Total) (discretionary and mandatory)	$ 31,753	$ 22,963
Distributed Offsetting Receipts (-)	(2,565)	-
Agency Outlays, Net (discretionary and mandatory)	**$ 29,188**	**$ 22,963**

The accompanying notes are an integral part of these statements.

Notes to the Financial Statements Table of Contents

Notes to the Financial Statements

As discussed in this document, HUD implemented several new processes to improve its internal financial controls and its financial statement close processes, which addressed several issues previously reported by the Office of Inspector General (OIG). In some instances, the extent of HUD's improvements required the OIG to conduct additional testing procedures, which required additional time for OIG to complete its audit process. Related to GNMA, GNMA fully implemented the subledger database, but the audit process and audit procedures could not be completed in a timely manner, resulting in a qualified opinion and delayed audit report.

Note 1: Summary of Significant Accounting Policies

Reporting Entity

HUD was created in 1965 to: 1) provide housing subsidies for low and moderate-income families; 2) provide grants to states and communities for community development activities; 3) provide direct loans and capital advances for construction and rehabilitation of housing projects for the elderly and persons with disabilities; and 4) promote and enforce fair housing and equal housing opportunity. In addition, HUD insures mortgages for single-family and multifamily dwellings, insures loans for home improvements and manufactured homes, and facilitates financing for the purchase or refinancing of millions of American homes.

HUD's major programs, including FHA and Ginnie Mae, are discussed in the Management Discussion & Analysis (MD&A) section. Also, FHA and Ginnie Mae are considered consolidating entities to HUD. The other major programs are as follows:

The Section 8 Rental Assistance programs assist low-income and very low-income families in obtaining decent and safe rental housing. HUD makes up the difference between what a low-income and very low-income families can afford and the approved rent for an adequate housing unit funded by the Housing Choice Voucher (HCV) Program.

The Low Rent Public Housing Grants program provides grants to Public Housing Authorities (PHAs) and Tribally Designated Housing Entities (TDHEs) for construction and rehabilitation of low-rent housing. This program is a continuation of the Low Rent Public Housing Loan program which pays principal and interest on long-term loans made to PHAs and TDHEs for construction and rehabilitation of low-rent housing.

The Homeless Assistance Grants (HAG) fund the formula Emergency Solutions Grant (ESG) program and the competitive Continuum of Care (CoC) program. Together, these programs fund the activities that comprise communities' homeless crisis response systems.

The Supportive Housing for the Elderly (Section 202) and Persons with Disabilities (Section 811) grant programs provide capital to nonprofit organizations sponsoring rental housing for the elderly and disabled. Prior to these programs being operated as grants, they were administered as 40-year loans.

The Community Development Block Grant (CDBG) programs provide funds for metropolitan cities, urban counties, and other communities to use for neighborhood revitalization, economic development, disaster recovery assistance (DR), and improved community facilities and services.

The Home Investments Partnerships (HOME) program provides grants to states, local governments, and Indian tribes to implement local housing strategies designed to increase home ownership and affordable housing opportunities for low-income and very low-income families.

HUD also has smaller programs which provide grants, subsidy funding, and direct loans to support other HUD objectives such as fair housing and equal opportunity, energy conservation, rehabilitation of housing units, removal of lead hazards, and maintenance costs of PHA and TDHE housing projects. These smaller programs are also included within the HUD consolidated revenues and financing sources reflected on the financial statements.

Under Federal Accounting Standards Advisory Board's (FASAB) S*tatements of Federal Financial Accounting Standards (SFFAS) No. 47: Reporting Entity*, HUD does not have any disclosure entities or related parties. Also, HUD does not consider activities with a parent agency as a disclosure entity or a related party. HUD provides financial information to the parent agency monthly to facilitate the agency's reporting consolidation.

Ginnie Mae's mission is primarily accomplished through its Mortgage Backed Security (MBS) guaranty program, which guarantees the timely payment of principal and interest on MBS to MBS investors. These securities are supported by federally insured or guaranteed residential loans. The structure of this MBS Guaranty program meets the definition of Public-Private Partnerships (P3s), based on Conclusive Risk Characteristics established in *SFFAS No. 49: Public-Private Partnerships: Disclosure Requirements*.

Most of the disclosure requirements are covered by Ginnie Mae's compliance with other disclosure requirements, notably *SFFAS No. 51: Insurance Programs* and are covered in Notes (1) Summary of Significant Accounting Policies, (8) Other Non-Credit Reform Loans, (17) Funds from Dedicated Collections, and (25) Insurance Programs. However, there are other *SFFAS No. 49*-specific disclosure requirements that are covered in Note (24) Public Private Partnerships (P3s).

FHA's portfolio is comprised of loan guarantees and direct loans for Single-Family, Multifamily, and Healthcare programs. The structure of these loan guarantees and direct loans fall under the definition of Public-Private Partnerships (P3s), based on Conclusive Risk Characteristics established in *SFFAS No. 49: Public-Private Partnerships: Disclosure Requirements*.

Most of the disclosure requirements are covered by FHA's compliance with other disclosure requirements, notably those under *SFFAS No. 2: Accounting for Direct Loans and Loan Guarantees,* and are covered in Notes (7) Direct Loans and Loan Guarantees, Non-Federal Borrowers, (16) Contingencies, (20) Commitments under HUD's Grant, Subsidy, and Loan Programs, and the consolidated Statement of Net Cost. However, there are other *SFFAS No. 49*-specific disclosure requirements that are covered in Note (24) Public Private Partnerships (P3s).

HUD Proper has many grant subsidies and loans programs that meet the definition of P3 as defined in *SFFAS No. 49: Public Private Partnerships:* Disclosure Requirements. Most programs meet the exclusion criteria outlined in the Statement and are not subject to the provisions. Others, like the credit reform programs, do not meet the exclusion criteria but do meet the conclusive characteristics criteria and therefore require disclosure.

Most of the disclosure requirements are covered by HUD's compliance with other disclosure requirements, notably *SFFAS No. 2: Accounting for Direct Loans and Loan Guarantees* and are covered in Notes (7) Direct Loans and Loan Guarantees, Non-Federal Borrowers, (16) Contingencies, (20) Commitments under HUD's Grant, Subsidy, and Loan Programs, and the consolidated Statement of Net Cost. However, there are other *SFFAS No. 49*-specific disclosure requirements that are covered in Note (19) Net Cost of HUD's Cross-Cutting Programs and Note (24) Public Private Partnerships (P3s).

Basis of Accounting and Presentation

The accompanying principal financial statements have been prepared to report the financial position, net cost, changes in net position, and budgetary resources of HUD in accordance with the OMB *Circular A-136, Financial Reporting Requirements*, and in conformance with the FASAB's *SFFAS* except for the presentation of comparative data. HUD Consolidated and Ginnie Mae Component presented its FS and Notes as a single year presentation for FY 2019. Due to the large volume and complexity of GNMA's non-pooled assets, HUD's OIG requested that HUD only present consolidated single-year (non-comparative) FY 2019 financial statements and notes. HUD was prepared and positioned to produce comparative financial statements and notes for FY 2019 and FY 2018 however, to be supportive of OIG's position, HUD agreed to present only single-year financial statements and notes for the FY 2019 AFR. The FHA Component presented its FS and Notes comparatively in its Annual Management Report for FY 2019.

Pursuant to *SFFAS No. 34: The Hierarchy of Generally Accepted Accounting Principles (GAAP),* if the accounting treatment for a transaction or a similar event is not specified in FASAB and its related guidance, agencies are allowed to consider other accounting standards and guidance. Ginnie Mae has applied *SFFAS No. 34* in the accounting and presentation of its reimbursable costs, which is included on the Accounts Receivable, Net line in the accompanying Balance Sheet, and its Other Non-Credit Reform Loans line, including associated interest income and accrued interest receivable.

Details of the accounting policies for these items are included in the sections titled "Accounts Receivable, Net" and "Other Non-Credit Reform Loans" below.

Pursuant to *SFFAS No. 56: Classified Activities, under paragraph 12,* the accounting standards require all reporting entities to disclose certain presentations and disclosures to be modified, if needed, to prevent the disclosure of classified information.

HUD's financial statements include all the accounts and transactions of HUD Proper, FHA, Ginnie Mae, and its grant, subsidy, and loan programs. All inter-fund accounts receivable, accounts payable, advances, prepayments, transfers in, and transfers out within these programs have been eliminated.

The financial statements are presented on the accrual and budgetary basis of accounting. Under the accrual method, HUD recognizes revenues when earned, and expenses when a liability is incurred, without regard to receipt or payment of cash. The budgetary basis of accounting recognizes the obligation of funds according to legal requirements, which in many cases occurs prior to an accrual-based transaction. The use of budgetary accounting is essential for compliance with legal requirements and controls over the use of Federal funds.

The Department's disbursement policy permits grantees/recipients to request funds to meet immediate cash needs to reimburse themselves for eligible incurred expenses and eligible expenses expected to be received and paid within three days or as subsidies payable in accordance with the *Cash Management Improvement Act of 1990* (CMIA). The exception is Public and Indian Housing's (PIH) HCV and Moving to Work (MTW) programs, where funds are paid on the first day of the month to cover rental expenses for that month.

Use of Estimates

The preparation of the principal financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the reporting period. Actual results may differ from those estimates.

Amounts reported for net loans receivable, related foreclosed property, and the loan guarantee liability represent the Department's best estimates based on available, pertinent information.

To estimate the Allowance for Subsidy associated with loans receivable, related foreclosed property, and the Liability for Loan Guarantees, the Department uses cash flow model assumptions associated with the loan guarantees subject to the *Federal Credit Reform Act of 1990 (FCRA)* to estimate the cash flows associated with future loan performance. To make reasonable projections of future loan performance, the Department develops assumptions based on historical data, current and forecasted programs, and economic assumptions.

Certain programs have higher risks due to increased chances of fraudulent activities perpetrated against the Department. The Department accounts for these risks through the assumptions used in the liabilities for loan guarantee estimates. HUD develops the assumptions based on historical performance and management's judgments about future loan performance.

OCFO and PIH worked together to develop an estimation methodology to determine its quarterly prepayment balances due to timing constraints on obtaining the actual data. In FY 2019, OCFO, PIH, and Indian Housing Block Grant (IHBG) worked to develop an estimation methodology to determine its annual advance balances on the portion that is invested by eligible grantee recipients due to timing constraints on obtaining the actual data.

The PIH prepayment and advance estimate assumptions are disclosed in Note (10) PIH Prepayments and Advances.

HUD has a grant accrual policy and continues to refine its methodologies and the underlying assumptions within that policy to develop the estimates. Grant accruals are calculated by the various program areas listed below on a quarterly basis and recorded in the trial balance to be included in the Financial Statements. The accruals are reversed in a later accounting period.

***PIH*:** The grant accruals are completed for the following programs within PIH: Public Housing Capital Fund, HOPE VI/Choice Neighborhoods, Indian Housing Block Grant, and Native Hawaiian Housing Block Grant. This accrual calculates HUD's obligations/liability for work completed but has not been billed in its grant programs. The grant accrual is calculated by taking the actual total disbursements over a twelve-month period, divided by the number of months in a year, times a month and a half or 1.5. The two key assumptions are equal monthly disbursements and one month and a half or 45 days processing time.

CoC: This grant accrual uses historical data based on the pattern of declining monthly grant balances. Based on the pattern of the balances, the program office can project the expenses that will be incurred and billed monthly based on the volume and timing of grant funding and reasonable assumptions about the time period over which incurred expenses are billed.

Community Planning & Development (CPD): This grant accrual consists of HOME Investment Partnership Program (HOME); Community Development Block Grants Program (CDBG); Housing Opportunities for Persons with Aids (HOPWA); HUD Emergency Assistance Grant Program (HESG); and the Homelessness, Prevention and Rapid Re-Housing Program (HPRP). HOME and CDBG follow the same methodology. The working assumption for each is that the expenses accrue over a period of time (which varies by activity and type) and are generally billed to the government within a particular interval of time from being incurred. The calculation process involves a financial model that takes into account the past history of the total funded amounts by month for each CDBG and HOME activity type.

Housing Opportunities for Persons with Aids (HOPWA), HUD Emergency Assistance Grant (HESG), and Homelessness Prevention and Rapid Rehousing (HPRP)**:** Each program follows the same methodology and has calculations based on historical figures for each program's current year (which is expressed as a percentage of current period draws). This number is then applied to the total monthly withdrawn amount for the specified period.

Housing Counseling Assistance Program**:** The program takes actual disbursements made to grantees for a 12-month period ending on the financial reporting date. Grantees' drawdowns and spending patterns throughout the year may vary by grantee, and by month, based on various factors. By taking a 12-month average it allows for "smoothing" or "normalization" of data and eliminates any seasonal effect or big variations in appropriations or award announcement timing. The grant accrual is calculated by taking the total disbursements for the 12-month period and dividing it by 6 which will give the average 2-month disbursements that is used for the grant accrual.

Housing for the Elderly and Housing for Disabilities': This methodology is based on four assumptions. (1) Disbursements under the Project Rental Assistance Contract (PRAC) and Section 811 Project Rental Assistance (PRA) are excluded because they are project based and operate the same way as the Project Based Rental Assistance (PBRA) program which is on the CFO's Excluded Programs list. (2) The number of traditional Section 202 and Section 811 projects remaining in the pipeline have decreased since no new projects have been funded since the *Appropriations Act of 2011*. (3) Disbursements tend to be higher during the fiscal year 4th quarter as offices try to achieve their goals of completing initial and final closings for Section 202 and Section 811 projects. (4) On average, there is a 30-day (or less) processing time for project/grantee to request and draw down funds. Disbursements for a month will generally reflect the expenses invoiced in the previous month.

OCFO and CPD revised its methodology in FY 2018 for estimating CDBG-DR accruals. The revised methodology uses a point estimate in conjunction with the program specific unliquidated obligations to determine a ratio. Once this ratio is determined, it is applied to the period in which an accrual is desired to be calculated. Neighborhood Stabilization Program (NSP) was not included in the accrual calculation for FY 2019 due to immaterial amounts of outlays. CPD's grant accrual estimates are statistically validated through annual execution of grantee survey responses.

Ginnie Mae has made significant estimates in a variety of areas including, but not limited to, its valuation of certain financial instruments such as: acquired property, allowance for loss on mortgage loans held for investment including accrued interest, claims and other loan receivables which are all included in the balance of Other Non-Credit Reform Loans line in the accompanying Balance Sheet (BS); as well as the liability for loss on remaining coverage associated with the administration of the MBS program guaranty included in the balance of Other Liabilities in the accompanying BS. Actual results could differ from those estimates. See Note (6) Accounts Receivable, Net, Note (8) Other Non-Credit Reform Loans, and Note (25) Insurance Programs for additional information.

Entity and Non-Entity Assets

Assets are classified as either entity or non-entity assets. Entity assets are those that HUD has authority to use for its operations. Non-entity assets are those held by HUD but unavailable for use in its operations. Non-entity assets are offset by liabilities to third parties and have no impact on net position. HUD combines its entity and non-entity assets on the balance sheet and discloses its non-entity assets. For additional information see Note (2) Non-Entity Assets.

Fund Balance with U.S. Department of the Treasury (Treasury)

HUD maintains all cash accounts with Treasury. Treasury processes cash receipts and disbursements on behalf of HUD. HUD's accounting records are reconciled with Treasury on a monthly basis. HUD has several types of funds which include General, Revolving, Trust, and other fund types such as deposit and clearing accounts.

Ginnie Mae's business operations are fully funded by dedicated offsetting collections paid by Financial Institutes (Issuers) participating in the Mortgage-Backed Securities (MBS) Guarantee Program. Although Ginnie Mae's MBS Guarantee Program is not subject to *Federal Credit Reform Act* (FCRA), Ginnie Mae uses the program, financing, liquidating and capital reserve accounts to process its cash receipts and disbursements through Treasury. Cash held with Treasury includes Ginnie Mae's capital reserves (unavailable until apportioned by OMB) and available spending authority of obligated and unobligated balances available to finance allowable expenditures.

The capital reserve is a budget account that retains the MBS Guarantee Program's negative subsidy, downward re-estimates, and overnight securities interest collections. The capital reserve account maintains Ginnie Mae's unobligated reserve balances which are transferred to the program and/or financing accounts (as needed) to fund business operations.

The program account is a budget account that receives multiclass, commitment and service fee collections from Issuers and non-expenditures transfers (NET) from Ginnie Mae's capital reserve account to cover program contract obligations. The program account also disburses the upward re-estimates to the financing account; and receives spending authority appropriations enabling Ginnie Mae to use its Multiclass and Commitment fee collections to fund its administrative salaries and expenses.

The liquidating account is a budget account that receives overnight securities interest collections and records unclaimed security holders cash flows. The liquidating account maintains a spending authority level of $100 million and transfers collections in excess of that threshold to the capital reserve account.

The financing account is a non-budgetary account that records all cash flows resulting from Ginnie Mae's MBS guarantee. The financing account receives guarantee pool transfers and other program fee collections from Issuers. It receives claim payments from direct loan and loan guarantee agencies. It receives non-expenditure transfers (NET) from Ginnie Mae's capital reserve account to cover contract obligations, MBS guarantee program disbursements such as principle and interest past-through payments to MBS investors, and negative subsidy and downward re-estimate payments to the capital reserve account. The financing account also receives upward re-estimate payments from the program account. The unobligated balances in the financing account are not invested in Treasury securities and does not receive an uninvested interest collection from Treasury.

Prior to September 30, 2018, Ginnie Mae earned and collected interest on uninvested funds, which was calculated using the applicable version of the Credit Subsidy Calculator (CSC2) provided by the OMB. In September 2018, Treasury clarified rules regarding the collection of interest on uninvested funds in the Financing Account. Based on additional conversations with Treasury, Ginnie Mae was not entitled to earn interest on uninvested funds without a signed borrowing agreement in accordance with FCRA. Ginnie Mae is in ongoing discussions with OMB and its legal counsel on whether the Financing Account is fully subject to the provisions of FCRA. Resolution of the matter between Ginnie Mae and OMB is pending, Treasury and Ginnie Mae have agreed that Ginnie Mae will not earn and collect interest on uninvested funds. At present, there is uncertainty regarding applicability of FCRA to Ginnie Mae, and whether Ginnie Mae would be required to repay prior interest income received by Ginnie Mae (amounts, if any, to be determined) or be able to earn interest in the future.

Investments

HUD limits its investments that are principally comprised of investments by FHA's Mutual Mortgage (MMI)/Cooperative Management Housing Insurance (CMHI) Fund and Ginnie Mae, to non-marketable market-based Treasury interest-bearing obligations (i.e., investments not sold in public markets). The market value and interest rates established for such investments are the same as those for similar Treasury issues, which are publicly marketed.

HUD's investment decisions are limited to Treasury policy's which: 1) only allows investment in Treasury notes, bills, and bonds; and 2) prohibits HUD from engaging in practices that result in "windfall" gains and profits, such as security trading and full-scale restructuring of portfolios in order to take advantage of interest rate fluctuations. FHA's normal policy is to hold investments in U.S. Government securities to maturity. However, in certain circumstances, FHA may have to liquidate its U.S. Government securities before maturity. FHA uses the straight-line amortization method for the interest accrual and amortization of discounts for its investments in short-term Treasury bills. For its investments in long-term Treasury notes and bonds, FHA uses the effective interest rate method to account for bond discount accretion and bond premium amortization.

Ginnie Mae's U.S. Treasury short-term investments consist of one-day overnight certificates that are issued with a stated rate of interest to be applied to their par value with a maturity date of the next business day. These overnight certificates are measured at cost, which approximates fair value. There is no amortization on Ginnie Mae's short-term investments.

HUD reports investments in U.S. Government securities at amortized cost. Premiums or discounts are amortized into interest income over the term of the investment. HUD intends to hold investments to maturity, unless needed for operations. No provision is made to record unrealized gains or losses on these securities, because in most cases, they are held to maturity. See Note (5) Investments for additional information.

Accounts Receivable, Net

HUD's accounts receivables include partial claims and generic debt, fees, interest, reimbursable costs, criminal restitution and other.

FHA's Single-Family Notes (SFN), Accounting Area 65, records the loss mitigation activity for all partial claim notes. Each subsection of the loss mitigation program has a particular set of qualifications and requirements that were put in place to assist borrowers who were in default or imminent default of retaining their homes, and/or to reduce losses to the insurance fund that result from mortgage foreclosures. Any FHA-insured borrower who is in default for a least 120 days and who occupies the mortgaged property as a primary residence can obtain a partial claim for the delinquent portion of their mortgage. The partial claimed note is not due until the 1st lien has been paid in full.

All HUD/FHA debt types are referred to as Generic Debts. Generic Debts may be consumer debts or commercial debts. Each debt type is associated with an accounting category, which facilitates appropriate financial reporting. The Financial Operations Center (FOC) is responsible for servicing and collection of debts and receivables that are transferred from other organizations within HUD to FOC. It has established processes and systems to automatically refer delinquent non-tax debts to the Department of Treasury and can take other actions that are required by the *Debt Collection Improvement Act (1996)*. FOC responsibility for debt collection begins when it receives a referral package and this package contains sufficient documentation to load the debt into the DCAMS system. The actual documents and information submitted will vary based on the type of debt.

Ginnie Mae accrues interest on mortgage loans held for investment at the contractual rate and records an allowance on accrued interest to the extent interest is uncollectable for conventional loans, and to the extent interest is not expected to be recovered per insurance guidelines for insured or guaranteed loans. Ginnie Mae's policy is to record interest on FHA-insured delinquent loans at the debenture rate, or rate per relevant insuring agency guidelines, as applicable, and place delinquent uninsured loans on nonaccrual status. Ginnie Mae determines the allowance for uncollectable accrued interest for loans which are not impaired under *SFFAS No. 1*: *Accounting for Selected Assets and Liabilities – Accounts Receivable* and *SFFAS No. 5*: *Accounting for Liabilities of the Federal Government – Contingencies*.

Ginnie Mae places uninsured loans on a nonaccrual status, which means that the interest is no longer accrued or recorded as earned for the loan, once principal and interest are 90 days or more past due, and Ginnie Mae believes collectability of payments is not reasonably assured. For uninsured loans placed on non-accrual status, interest previously accrued but not collected becomes a part of Ginnie Mae's recorded investment for the loan. The recorded investment represents the total recorded book value which is assessed for impairment purposes. Since FASAB currently does not directly address the accounting treatment for impairment of non-credit reform loan receivables, Ginnie Mae assesses interest under *Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) 310 Receivables* for its impaired loans, in accordance with *SFFAS No. 34: The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board.* When a loan is on non-accrual status, Ginnie Mae has elected to apply any cash received for uninsured loans to the carrying value of the loan based on the cost recovery method. The cost recovery method defers recognition of any income related to the loan until the entire carrying value has been recovered.

Once insured loans are 90 days or more past due, they are placed on modified accrual status, whereby interest is accrued at the rate recoverable from the insurer, which is typically less than the original contractual rate. For insured loans placed on modified accrual status, interest previously recognized at the contractual rate is not reversed but becomes a part of Ginnie Mae's recorded investment. For FHA insured loans on modified accrual status, cash receipts are applied in accordance with the principal and interest amortization schedule due to the extent of the coverage provided by the FHA insurance which makes recovery more certain. For loans insured or guaranteed by other insurers/guarantors (Rural Development (RD), Veteran Affairs (VA), or PIH), Ginnie Mae has elected to apply cash received to the carrying value of the loan based on the cost recovery method, since amounts recovered may be less.

Loans can be returned to accrual status if Ginnie Mae is able to determine that all principal and interest amounts contractually due are reasonably assured of repayment within a reasonable period and there is a sustained period of reperformance. If a loan is modified, during the trial modification period, interest income is recognized when cash is received, rather than accrued under the modified terms, until the borrower has demonstrated the ability to meet the terms of the modified loan and the amounts become sufficiently assured of repayment to warrant accrual treatment.

Ginnie Mae advances funds to preserve its interests in mortgaged property, such as advances to cover shortfalls for mortgagors' taxes and insurance when escrow balances are insufficient, or pre-foreclosure and foreclosure costs and other expenses, such as Homeowners Association fees incurred during the foreclosure process. These costs may be recovered through borrower repayments, proceeds from liquidation of mortgaged property, or, for insured loans, from reimbursement by the insuring agency. Costs incurred on both pooled and non-pooled loans expected to be reimbursed are recorded as reimbursable costs receivable and reported net of allowance for amounts that management believes will not be collected. The allowance for reimbursable costs is estimated based on historical experience, which includes expected collections from the mortgagors, proceeds from the sale of the property, and reimbursements collected from insurers or guarantors such as FHA, RD, VA, and PIH. See Note (6) Accounts Receivables, Net for additional information.

Credit Reform Accounting

The primary purpose of the FCRA, which became effective on October 1, 1991, is to more accurately measure the cost of Federal credit programs and to place the cost of such credit programs on a basis equivalent with other Federal spending. OMB *Circular A-11, Preparation, Execution, and Submission of the Budget Part 5*, titled *Federal Credit Programs*, defines loan guarantee as any guarantee, insurance or other pledge with respect to the payment of all or part of the principal or interest on any debt obligation of a non-Federal borrower (Issuer) to a non-Federal lender (Investor).

The FCRA establishes the use of the program, financing, and general fund receipt accounts for loan guarantees committed and direct loans obligated after September 30, 1991, (Credit Reform). It also establishes the liquidating account for activity relating to any loan guarantees committed and direct loans obligated before October 1, 1991, (pre-Credit Reform). These accounts are classified as either budgetary or non-budgetary in the *Combined Statement of Budgetary Resources (SBR).* The budgetary accounts include the program, capital reserve and liquidating accounts, whereas the non-budgetary accounts consist of the credit reform financing accounts.

The program account is a budget account that receives and obligates appropriations to cover the subsidy cost of a direct loan or loan guarantee and disburses the subsidy cost to the financing account. The program account also receives appropriations for administrative expenses. The financing account is a non-budgetary account that records all cash flows resulting from Credit Reform direct loans or loan guarantees. It disburses loans, collects repayments and fees, makes claim payments, holds balances, borrows from Treasury, earns or pays interest, and receives the subsidy cost payment from the program account. Although Ginnie Mae does not follow Credit Reform, its financing account is a non-budgetary account.

The general fund receipt account is a budget account used for the receipt of amounts paid from the financing account when there are negative subsidies from the original estimate or a downward re-estimate. In most cases, the receipt account is a general fund receipt account and amounts are not earmarked for the credit program. They are available for appropriations only in the sense that all general fund receipts are available for appropriations. Any assets in this account are non-entity assets and are offset by intragovernmental liabilities. At fiscal year end, the fund balance in the general fund receipt account is transferred to Treasury's General Fund. The FHA general fund receipt accounts for the General Insurance (GI) and Special Risk Insurance (SRI) funds are also in this category.

The capital reserve account was created to retain the MMI/CMHI negative subsidy and subsequent downward re-estimates. Specifically, the *National Affordable Housing Act of 1990* (NAHA) requires that FHA maintain a 2 percent Capital Ratio in the MMI Fund.

The Capital Ratio is defined as the ratio of economic net worth (current cash plus the present value of all future net cash flows) of the MMI fund to unamortized insurance in force (the unpaid balance of insured mortgages). Therefore, to ensure the calculated capital ratio reflects the actual strength of the MMI fund, the resources of the capital reserve account, which are considered FHA assets, are included in the calculation of the MMI fund's economic net worth.

The liquidating account is a budget account that records all cash flows to and from FHA resulting from pre-Credit Reform direct loans or loan guarantees. Liquidating account collections in any year are only available for obligations incurred during that year or to repay debt. Unobligated balances remaining in the GI and SRI liquidating funds at year-end are transferred to Treasury's General Fund. Consequently, in the event that resources in the GI/SRI liquidating account are otherwise insufficient to cover the payments for obligations or commitments, the FCRA provides the GI/SRI liquidating account with permanent indefinite authority to cover any resource shortages.

Credit Program Receivables and Related Foreclosed Property

HUD finances mortgages and provides loans to support construction and rehabilitation of low-rent housing, principally for the elderly and disabled under the Section 202/811 program. FHA's loans receivable includes Mortgage Notes Assigned (MNAs), also described as Secretary-Held Notes, Purchase Money Mortgages (PMM), notes related to partial claims, and direct loans relating to the Federal Financing Bank (FFB) Risk Share Program. Under the requirements of the FCRA, PMM notes are considered to be direct loans while MNA notes are considered to be defaulted guaranteed loans. The PMM loans are generated from the sales on credit of FHA's foreclosed properties to qualified non-profit organizations. The MNA notes are created when FHA pays the lenders for claims on defaulted guaranteed loans and takes assignment of the defaulted loans for direct collections. The majority of MNAs are Home Equity Conversion Mortgages (HECM) notes. HECM loans, while not in default, are assigned to HUD when they reach 98 percent of their maximum claim amount. In addition, multifamily mortgages are assigned to FHA when lenders file mortgage insurance claims for defaulted notes.

Credit program receivables for direct loan programs and defaulted guaranteed loans assigned for direct collection are valued differently based on the direct loan obligation or loan guarantee commitment date. These valuations are in accordance with the FCRA and *SFFAS No. 2: Accounting for Direct Loans and Loan Guarantees*, as amended by *SFFAS No. 18: Amendments to Accounting Standards for Direct Loans and Loan Guarantee in Statement of Federal Financial Accounting Standards No. 2."* Those obligated or committed on or after October 1, 1991 (post-Credit Reform) are valued at the net present value of expected cash flows associated with these assets, primarily from estimated proceeds less selling and maintenance costs. The difference between the cost of these loans and properties and the net present value is called the Allowance for Subsidy. Pre-Credit Reform loans receivable and related foreclosed property in inventory are recorded at net realizable value which is based on recovery rates net of any selling expenses. See Note (7) Direct Loans and Loan Guarantees, Non-Federal Borrowers for additional information on pre-credit reform loans.

Credit program receivables resulting from obligations or commitments prior to October 1, 1991, (pre-Credit Reform) are recorded at the lower of cost or fair value (net realizable value). Fair value is estimated based on the prevailing market interest rates at the date of mortgage assignment. When fair value is less than cost, discounts are recorded and amortized to interest income over the remaining terms of the mortgages or upon sale of the mortgages. Interest is recognized as income when earned. However, when full collection of principals is considered doubtful, the accrual of interest income is suspended and receipts (both interest and principal) are recorded as collections of principals. Pre-Credit Reform loans are reported net of allowance for loss and any unamortized discount. The estimate for the allowance on credit program receivables is based on historical loss rates and recovery rates resulting from asset sales, property recovery rates, and net cost of sales.

Foreclosed property acquired as a result of defaults of loans obligated or loan guarantees committed on or after October 1, 1991, is valued at the net present value of the projected cash flows associated with the property. Foreclosed property acquired as a result of defaulted loans obligated or loan guarantees committed prior to 1992 is valued at net realizable value. The estimate for the allowance for loss related to the net realizable value of foreclosed property is based on historical loss rates and recovery rates resulting from property sales, and net cost of sales.

Other Non-Credit Reform Loans

Other Non-Credit Reform Loans consist of Ginnie Mae Advances, Mortgage Loans Held for Investment, Claims Receivable, and Properties Held for Sale.

Ginnie Mae Advances, Net

Advances represent Ginnie Mae pass-through payments to fulfill the guarantee of timely principal and interest (P&I) payments to Mortgage-Backed Securities (MBS) holders. Ginnie Mae reports advances net of an allowance for amounts not expected to be collected. Ginnie Mae calculates the allowance based on expected recovery amounts. The calculation incorporates reimbursements per established insuring or guaranteeing agency guidelines, Ginnie Mae’s collections experience, and other economic factors. Ginnie Mae reclassifies advances associated with loans purchased out of the MBS pools as part of the total recorded investment in the purchased loan.

Mortgage Loans Held for Investment, Net

Ginnie Mae approves issuers to pool loans and issue Ginnie Mae guaranteed MBS. For federal income tax purposes, the MBS pool created by the issuer is considered a grantor trust. As such, each of these “virtual trusts” are considered individual legal entities. When a Ginnie Mae issuer defaults, and is terminated and extinguished, Ginnie Mae steps into the role of the issuer and assumes all servicing rights and obligations of the issuer's entire Ginnie Mae guaranteed portfolio of mortgage loans. This includes loans in MBS pools created by the issuer and the obligation to make timely pass through payments to securities holders. Ginnie Mae utilizes a Master Sub-servicer (MSS) to service these portfolios. There are currently two MSS that service the terminated and extinguished issuer portfolios (pooled and non-pooled loans). Loans held in MBS pools are not included in the Balance Sheet since they are not assets owned by Ginnie Mae until purchased out of the pools.

In its role as servicer, Ginnie Mae assesses individual loans within its pooled portfolio to determine whether the loan must be purchased out of the pool. Ginnie Mae must purchase mortgage loans out of the MBS pool when the mortgage loans are ineligible for insurance by the FHA, RD, VA, or PIH, as well as loans that have been modified beyond the trial modification period. Additionally, Ginnie Mae has the option to purchase mortgage loans out of the MBS pool when the mortgage loans are insured but are delinquent for more than 90 days.

Ginnie Mae has the ability and the intent to hold acquired loans for the foreseeable future or until maturity, therefore, the mortgage loans are classified as Held for Investment (HFI). HUD reports the carrying value of HFI loans on the Balance Sheet at the Unpaid Principal Balance (UPB) along with accrued interest, net of cost basis adjustments, and net of allowance for loan losses. Ginnie Mae records cost basis adjustments for HFI loans which are considered Troubled Debt Restructurings (TDR), or loans which are classified as Purchased Credit Impaired (PCI). Ginnie Mae also records an allowance for loan losses to reflect the collectability of the loans.

If HUD decides to sell the loans currently recognized on its Balance Sheet, HUD will reclassify the applicable loans from HFI to Held for Sale (HFS). For loans which are initially classified as HFI and subsequently transfers to HFS, those loans would be recognized at the lower of cost or fair value until sold, with any related cash flows classified as operating activities. At September 30, 2019, HUD had no loans classified as HFS, and mortgage loans held for investment included only single-family loans.

Allowance for Loan Losses

Ginnie Mae performs periodic and systematic reviews of its loan portfolios to identify credit risks and assess the overall collectability of the portfolios. Ginnie Mae recognizes the estimated uncollectable portion of its recorded investment in the loans when (1) available information at each BS date indicates that it is probable a loss has occurred and (2) the amount of the loss can be reasonably estimated.

Loans which have not been classified as TDR or PCI are evaluated collectively. For large groups of homogeneous loans that are collectively evaluated, Ginnie Mae records an allowance for loan losses against both principal and interest. When Ginnie Mae determines that it is probable, a credit loss will occur, and that loss can be reasonably estimated. Ginnie Mae recognizes the estimated amount of the incurred loss in the allowance for loan losses. Ginnie Mae aggregates its mortgage loans based on common risk characteristics, primarily by the type of guarantee or insurance (FHA, RD, VA, PIH) associated with the loan, as each has a different recovery rate. Ginnie Mae also categorizes uninsured loans separately from insured loans. The allowance for loan losses estimate is calculated using statistical models that are based on historical loan performance and insurance recoveries. The estimate also includes qualitative factors, where applicable. This estimated allowance for losses represents management's best estimate of probable credit losses inherent in Ginnie Mae's mortgage loan portfolio. The allowance is netted against the recorded investment in mortgage loans.

Ginnie Mae charges off accrued interest and unpaid principal balances when it believes collectability of interest or principal is not reasonably assured. Ginnie Mae charges off confirmed losses against the asset (loan) and allowance for loan losses when the asset is greater than 180 days delinquent. The charge off is determined based on the difference between the recorded investment and either fair market value or net recoverable value.

Ginnie Mae records recoveries of non-FHA insured loans previously charged-off when cash is received from the borrower related to principal and interest in excess of the recorded investment. For FHA loans, Ginnie Mae records recoveries of previously charged-off accrued interest amounts when cash is received from the borrower related to interest in excess of the recorded interest on its books. Recoveries of loans previously charged off are recognized as an increase to the allowance for loan losses when payment is received.

Ginnie Mae considers a loan to be impaired when, based on current information, it is probable that amounts due will not be received in accordance with the contractual terms of the loan agreement. Ginnie Mae's impaired loans include those modified in TDRs and PCI loans. Since FASAB currently does not directly address the accounting treatment for impairment of non-credit reform loans receivables, Ginnie Mae assesses loans under *FASB ASC 310 Receivables* for its impaired loans. For impaired loans, Ginnie Mae measures impairment based on the present value of expected future cash flows. Ginnie Mae's expectation of future cash flows incorporates, among other items, estimated probabilities of default and prepayment based on a number of economic factors as well as the characteristics of a loan. Additionally, Ginnie Mae considers the estimated value of the collateral, as reduced by estimated disposition costs, and estimated proceeds from insurance and similar sources, if applicable.

To avoid foreclosure, the MSS, on behalf of Ginnie Mae, may modify loans to help mortgagors who have fallen into financial difficulties with their mortgages. Methods of modifying loans may include offering concessions and restructuring the terms of the loan to alleviate the burden of the mortgagor. Some concessions made are a delay in payment that is more than insignificant; a reduction in the contractual interest rate that is lower than the market interest rate at the time of modification; interest forbearance for a period of time for uncollected interest amounts, that is more than insignificant; principal forbearance that is more than insignificant; and discharge of the mortgagor's obligation due to filing of Chapter (7) Bankruptcy. Ginnie Mae considers these modifications a concession to mortgagors experiencing financial difficulties and classifies these loans as TDRs. Ginnie Mae measures the impairment on these loans restructured in a TDR based on the excess of the recorded investment in the loan over the present value of the expected future cash flows discounted at the loan's original effective interest rate.

Ginnie Mae evaluates all purchased loans and assesses whether there is evidence of credit deterioration subsequent to the loan's origination and, if it is probable,at acquisition, that Ginnie Mae will be unable to collect all contractually required payments. Ginnie Mae considers insurance and guarantees from FHA, RD, VA, and PIH in determining whether it is probable that Ginnie Mae will collect all amounts due according to the contractual terms. Loans determined to meet these criteria are classified as Purchased Credit-Impaired (PCI). Ginnie Mae records realized losses on PCI loans when, upon purchase, the fair value is less than the acquisition cost of the loan. Ginnie Mae also recognizes the difference between the initial investment of the loan, and the undiscounted expected cash flows (known as the accretable yield) as interest income on a level-yield basis over the expected life of the loan.

Claims Receivable, Net

Claims receivable represent receivables for payments owed to Ginnie Mae from insuring agencies (FHA, RD, VA, and PIH). Claims receivable consist of two primary components:

Short sale claims receivable: A property may be sold for an agreed-upon price that falls short of amounts owed on the property as an alternative to foreclosure. This type of sale is known as a "short sale". Short sale proceeds are often times insufficient to fully pay off the mortgage. Ginnie Mae's MSS identifies loans that may be short sale eligible. This evaluation is based on factors such as delinquency, appraised value of the property, and location of the property. Ginnie Mae's Office of Issuer and Portfolio Management (OIPM) approves all short sales.

FHA is the largest insurer for Ginnie Mae. FHA typically pays Ginnie Mae the difference between the proceeds received from the sale and the UPB of the mortgage loan plus FHA-allowable delinquent interest, and other reasonable and customary costs per the FHA guidelines. FHA guidelines provide for interest claims to be calculated based on a debenture rate, as published by FHA. FHA does not reimburse the first two months of delinquent interest payments. Short sales on RD, VA, and PIH guaranteed loans follow a similar process in which the claims receivable amount is determined in accordance with the respective agency guidelines. Ginnie Mae records a short sale claims receivable while it awaits repayment of the shortfall amount from the insuring or guaranteeing agencies.

Ginnie Mae uses statistical models to assess the collectability of its claims receivable. The models estimate expected recovery based on insuring or guaranteeing agency guidelines and Ginnie Mae's historical experience. Ginnie Mae records an allowance for claims that are not expected to be recovered. Ginnie Mae charges off any uncollectable amounts against the allowance, once losses are confirmed.

Foreclosed property: Ginnie Mae records foreclosed property when the MSS receives title to a residential real estate property. Title may be received pursuant to a legal foreclosure process, or when the mortgagor conveys all interest in the property to satisfy the loan through a “deed in lieu of foreclosure” or similar legal agreement. These properties differ from acquired properties as Ginnie Mae intends to convey the property to an insuring or guaranteeing agency, instead of marketing and selling the properties. The amount of the claim receivable is determined based on the underlying insuring or guaranteeing agency guidelines. Typically, this includes the UPB for the loan and any allowable interest and other costs per the guidelines.

Ginnie Mae uses statistical models to assess the collectability of its claims receivable. The models estimate expected recovery based on insuring or guaranteeing agency guidelines and Ginnie Mae’s historical experience. Ginnie Mae records an allowance for claims that are not expected to be recovered. Ginnie Mae charges off any uncollectable amounts against the allowance, once losses are confirmed.

Properties Held for Sale

Ginnie Mae recognizes properties held for sale (“acquired property”), when marketable title to the underlying property is obtained. Title may be obtained through a legal foreclosure process or deed in lieu of foreclosure or other similar legal agreements. These assets differ from “foreclosed property” as they are not conveyed to the insuring agencies and Ginnie Mae will hold the title while the properties are marketed for sale by the MSS.

Ginnie Mae initially measures acquired property at its fair value, net of estimated costs to sell. Ginnie Mae records a charge-off against the allowance for loan losses when the recorded investment in the loan prior to acquisition of title exceeds the fair value, net of estimated cost to sell, of the acquired property. If the fair value, net of estimated costs to sell, exceeds the recorded investment in the loan, Ginnie Mae recognizes a recovery for any forgone P&I. This amount is recognized with operating expenses included in gross cost in the accompanying Statement of Net Cost (SNC).

Ginnie Mae subsequently measures acquired property at the lower of its carrying value or fair value, less estimated costs to sell. Ginnie Mae recognizes any decreases in fair value, net of estimated costs to sell, below the carrying value through a valuation allowance. The offsetting charge for the valuation allowance is recorded as income (expense) on acquired property included in gross cost in the accompanying SNC. Any subsequent increase in fair value, net of estimated costs to sell, up to the cumulative loss previously recognized through the valuation allowance, is recognized with operating expenses included in gross cost in the SNC.

Ginnie Mae capitalizes subsequent improvement costs for acquired property. Ginnie Mae expenses other costs as incurred with operating expenses included in gross cost in the SNC. Ginnie Mae records gains and losses on sales of acquired property as the difference between the net sales proceeds and the carrying value of the property. These gains and losses are recognized through “Gains on Disposition of Assets – Other” included in earned revenues in the SNC. For additional information see Note (8) Other Non-Credit Reform Loans.

Liabilities

Liabilities represent actual and estimated amounts to be paid as a result of transactions or events that have already occurred. However, no liabilities can be paid by HUD without budget authority. Liabilities for which an appropriation has not been enacted are classified as liabilities not covered by budgetary resources, and there is no certainty that an appropriation will be enacted.

Borrowings

As further discussed in other notes, several of HUD's programs have the authority to borrow funds from Treasury for program operations. These borrowings, representing unpaid principal balances and future accrued interest, are reported as debt in HUD's consolidated financial statements. The Department also borrows funds from the private sector to assist in the construction and rehabilitation of low rent housing projects under the PIH Low Rent Public Housing Loan Program. Repayments of these long-term borrowings have terms up to 40 years.

Liability for Loan Guarantees

The net potential future losses related to FHA's central business of providing mortgage insurance are accounted for as Loan Guarantee Liability in the consolidated balance sheet. As required by *SFFAS No. 2*, the Loan Guarantee Liability (LGL) includes the Credit Reform Related Liabilities for Loan Guarantees (LLG) and the pre-Credit Reform Liability for Loan Reform (LLR).

The LLG is calculated as the net present value of anticipated cash outflows for defaults, such as claim payments, premium refunds, property costs to maintain foreclosed properties less anticipated cash inflows such as premium receipts, proceeds from asset sales and principal, and interest on Secretary-held notes.

HUD records loss estimates for its single-family LLR and multifamily LLR mortgage insurance programs operated through FHA. FHA records loss estimates for its single-family programs to provide for anticipated losses incurred (e.g., claims on insured mortgages where defaults have taken place, but claims have not yet been filed). FHA values its Pre-Credit Reform related notes and properties in inventory at net realizable value, determined on the basis of net cash flows. To value these items, FHA uses historical claim data, revenues from premiums and recoveries, and expenses of selling and maintaining properties.

Property, Plant, and Equipment, Net

Property, Plant, and Equipment, Net (PP&E) is comprised of capital assets used in providing goods or services. PP&E is stated at cost less accumulated depreciation. Acquisitions of PP&E include assets purchased or assets acquired through other means, such as through transfer in from another Federal entity, donation, devise (a will or clause of a will disposing of property), judicial process, exchange between a Federal entity and a non-Federal entity, and forfeiture.

Pursuant to *SFFAS No. 50: Establishing Opening Balances for General Property, Plant, and Equipment,* per paragraph 2, agencies can implement this standard, "after a period during which existing systems could not provide the information necessary for producing such GAAP-based financial statements without use of the alternative methods.

In FY 2019, HUD applied the "Prospective Capitalization" alternative method under *SFFAS No. 50* to write off the total balance for Internal Use Software (IUS) and IUS in Development in its HUD Proper component as of September 30, 2019. HUD's IUS subsidiary ledgers were not sufficient to support the HUD Proper component balances that were being reported in the financial statements

Federal Employees Compensation Act Liabilities

The *Federal Employees' Compensation Act* (FECA) provides income and medical cost protection to covered federal civilian employees injured on the job, employees who have incurred a work-related injury or occupational disease, and to beneficiaries of employees whose deaths are attributable to job-related injuries or occupational diseases. The FECA program is administered by the U.S. Department of Labor (DOL), which pays valid claims and subsequently seeks reimbursement from HUD for these paid claims.

The FECA liability consists of two components. The first component is based on actual claims paid by the DOL but not yet reimbursed by HUD. The second component is the estimated liability for future worker's compensation as a result of past events. HUD reports both components in the "Other Liabilities" line on the Consolidated Balance Sheet.

Accrued Unfunded Leave

Annual leave and compensatory time are accrued as earned and the liability is reduced as leave is taken. The liability at year-end reflects cumulative leave earned but not taken, priced at current wage rates. Earned leave deferred to future periods is to be funded by future appropriations. To the extent that current or prior year appropriations are not available to fund annual leave earned but not taken, funding will be obtained from future financing sources. Sick leave and other types of leave are expensed as taken.

Operating Revenue and Financing Sources

HUD finances operations principally through appropriations, collection of premiums and fees on its FHA and Ginnie Mae programs, and interest income on its mortgage notes, loans, and investment portfolio.

Appropriations for Grant and Subsidy Programs

HUD receives both annual and multi-year appropriations and recognizes those appropriations as revenue when related expenses are incurred. Accordingly, HUD recognizes grant-related revenue and related expenses as recipients perform under their contracts. HUD recognizes subsidy-related revenue and related expenses when the underlying assistance (e.g., provision of a Section 8 rental unit by a housing owner) is provided or upon disbursal of funds to PHAs.

Ginnie Mae Fees

Fees received for Ginnie Mae's guaranty of MBS are recognized as earned. Commitment fees represent income that Ginnie Mae earns for providing approved issuers with authority to pool mortgages into Ginnie Mae MBS. The authority Ginnie Mae provides issuers expires 12 months from issuance for single-family issuers and 24 months from issuance for multifamily issuers. Ginnie Mae receives commitment fees as issuers request commitment authority and recognizes the commitment fees as earned when issuers use their commitment authority, with the balance deferred until earned or expired (whichever occurs first). Fees from expired commitment authority are not returned to issuers. Multiclass fees represent one-time upfront fees related to the issuance of multiclass products. Multiclass products include Real Estate Mortgage Investment Conduits (REMICs) and Platinum Certificates. The fees received for REMICs consist of guaranty fee and may include a modification and exchange (MX) Combination fee. The guaranty fee is paid by the sponsor and is based upon the total principal balance of the deal. The MX combination fee allows the sponsor to combine REMIC and/or MX securities at the time of issuance. The guaranty fee is deferred and amortized into income evenly over the contractual life of the security. The MX combination fee, on the other hand, is recognized immediately in earnings (i.e., upon the combination of REMIC and/or MX securities). The fees received for Platinum Certificates are deferred and amortized into income evenly over the contractual life of the security. Ginnie Mae also recognizes income through fees related to new issuer applications, transfers of issuer responsibilities, and mortgage servicing fees.

Imputed Financing Sources

In certain instances, operating costs of HUD are paid out of funds appropriated to other Federal agencies. For example, the Office of Personnel Management (OPM), by law, pays certain costs of retirement programs. When costs that are identifiable to HUD and directly attributable to HUD operations are paid for by other agencies, HUD recognizes these amounts as operating expenses. In addition, HUD recognizes an imputed financing source on the Consolidated SCNP to reflect the funding of HUD operations by other Federal agencies.

Appropriations and Monies Received from Other HUD Programs

The National Housing Act of 1990, as amended, provides for appropriations from Congress to finance the operations of GI and SRI funds. For Credit Reform loan guarantees, appropriations to the GI and SRI funds are provided at the beginning of each fiscal year to cover estimated losses on insured loans during the year. For pre-Credit Reform loan guarantees, FHA has permanent, indefinite appropriation authority to finance any shortages of resources needed for operations.

Monies received from other HUD programs, such as interest subsidies and rent supplements, are recorded as revenue for the liquidating accounts when services are rendered. Monies received for the financing accounts are recorded as additions to the Liability for Loan Guarantee or the Allowance for Subsidy when collected.

Full Cost Reporting

SFFAS No. 4: Managerial Cost Accounting Concepts and Standards, for the Federal Government, requires that full costing of program outputs be included in Federal agency financial statements. Full cost reporting includes direct, indirect, and inter-entity costs. For purposes of the consolidated department financial statements, HUD estimated each responsible segment's share of the program costs or resources provided by HUD or other Federal agencies. In accordance with *SFFAS No. 55: Amending Inter-Entity Cost Provisions*, HUD records the required inter-entity costs which includes personal benefits and Treasury Judgment fund settlements. HUD has also elected to record inter-entity costs for a non-business type activity with Homeland Security for IT services.

Retirement Plans

HUD's employees participate in either the Civil Service Retirement System (CSRS) or the Federal Employees Retirement System (FERS). FERS went into effect pursuant to *Public Law 99-335* on January 1, 1987. Most employees hired after December 31, 1983, are automatically covered by FERS and Social Security. Employees hired before January 1, 1984, may have elected to either join FERS and Social Security or remain in CSRS. HUD expenses its contributions to the retirement plans.

A primary feature of FERS is that it offers a savings plan whereby HUD automatically contributes 1 percent of pay and matches any employee contribution up to 5 percent of an individual's basic pay. Under CSRS, employees can contribute up to $18,500 per year of their pay to the savings plan, but there is no corresponding matching by HUD. Although HUD funds a portion of the benefits under FERS relating to its employees and makes the necessary withholdings from them, it has no liability for future payments to employees under these plans, nor does it report CSRS or FERS assets, accumulated plan benefits, or unfunded liabilities applicable to its employees' retirement plans.

Fiduciary Activities

Fiduciary activities are the collection or receipt, and the management, protection, accounting, investment, and disposition by the Federal Government of cash or other assets in which non-Federal individuals or entities have an ownership interest that the Federal Government must uphold. Fiduciary assets are not assets of the Federal Government.

Ginnie Mae has immaterial fiduciary activities which involve the collection or receipt and subsequent disposition of cash in which non-Federal entities have an ownership interest. Fiduciary assets are not assets of Ginnie Mae or the Federal Government. The fiduciary assets held by Ginnie Mae include escrow funds held in trust. The fiduciary amount is $28 million at September 30, 2019.

Net Cost

Net cost consists of gross costs and earned revenue. Gross costs and earned revenue are classified as intragovernmental (exchange transactions between HUD and other entities within the Federal Government) or public (exchange transactions between HUD and non-Federal entities).

Net program costs are gross costs less revenue earned from activities. HUD determines gross cost and earned revenue by tracing amounts back to the specific program office. Administrative overhead costs of funds unassigned are allocated based on full-time employee equivalents of each program.

Net Position

Net position consists of unexpended appropriations and cumulative results of operations. Unexpended appropriations include undelivered orders and unobligated balances, except for amounts in financing accounts, liquidating accounts, and trust funds. Cumulative results of operations represent the net difference since inception between 1) expenses and 2) revenues and financing sources.

Funds from Dedicated Collections

Funds from Dedicated Collections are financed by specifically identified revenues, often supplemented by other financing sources that are originally provided to the Federal Government by a non-Federal source, which remain available over time. These specifically identified revenues and other financing sources are required by statute to be used for designated activities, benefits, or purposes, and must be accounted for separately from the Federal Government's general revenues. See Note (17) Dedicated Collections for additional information.

HUD changed the presentation of its funds from dedicated collections on the BS and Statement of Changes in Net Position (SCNP), in FY 2018, from consolidating to combining based on the most recent guidance in the OMB *Circular A-136*. Non-exchange revenue and other financing sources from funds from dedicated collections, including net cost of operations, are shown separately on the SCNP. The portion of cumulative results of operations attributable to funds from dedicated collections is shown separately on both the SCNP and the BS.

Allocation Transfers

HUD is a party to allocation transfers with other Federal agencies as a transferring (parent) entity and/or a receiving (child) entity. Allocation transfers are legal delegations by one department of its authority to obligate budget authority and outlay funds to another department. A separate fund account (allocation account) is created in Treasury as a subset of the parent fund account for tracking and reporting purposes. All allocation transfers of balances are credited to this account, and subsequent obligations and outlays incurred by the child entity are charged to this allocation account as they execute the delegated activity on behalf of the parent entity. Parent agencies report both the proprietary and budgetary activity, but the child agency does not report any financial activity related to budget authority allocated from the parent agency to the child agency. HUD is the child for two allocation transfers, the Appalachian Regional Commission and the Department of Transportation.

Corrections of Errors

HUD has made significant strides in improving its overall internal control processes over financial reporting. HUD has worked diligently over the past year to improve the integrity of its financial data by implementing controls through the financial management transformation initiative. Some of those controls included strengthening cross collaboration throughout HUD, establishing special purpose work groups to identify areas requiring refinement and implementing new processes to ensure financial data integrity and compliance with regulatory requirements. As a result of the improved processes put in place, HUD was able to identify correction of errors to avoid causing material misstatements to HUD's financial statements and notes. The correction of errors are listed below.

HUD's new internal controls identified that the Rental Assistance Demonstration (RAD) conversion funds under the Section 8 program were incorrectly classified as Funds from Dedicated Collections instead of All Other Funds. This caused a misclassification on the consolidated Statement of Changes in Net Position (SCNP)'s Unexpended Appropriations line in the amount of $68 million. The overall impact to the consolidated SCNP is zero, since this a reclassification between lines. The consolidated note impacted by this reclassification is Note (17) Funds from Dedicated Collections. The Unexpended Appropriations line was impacted by ($68) million on the Funds from Dedicated Collections column and $68 million on the All Other Funds column, with a net impact of zero.

In FY 2019, HUD implemented a new estimation methodology to determine the portion of expenses that should be recorded as advances for those investing grantees that participate in the PIH IHBG programs. The estimation methodology was recorded retroactively in the amount of $206 million affecting the beginning balance on the following consolidated financial statements: the BS's PIH Prepayment and Advances (Note 10) and Unexpended Appropriations-All Other lines and the SCNP's Unexpended Appropriations line. The consolidated note impacted by this correction is Note (10) PIH Prepayment and Advances.

HUD's new internal controls identified and corrected an abnormal unexpended appropriations balance in its Flexible Subsidy Program. The abnormal balance occurred due to an incorrect posting model used to record two rescissions. The correction of error in the amount of $376 million impacted the following consolidated financial statements: the BS's Unexpended Appropriations and Cumulative Results of Operations-Funds from Dedicated Collection lines and the SCNP's Unexpended Appropriations and Cumulative Results of Operations Corrections of Errors lines. The overall net impact on the BS and SCNP net position was zero. The consolidated note impacted by this correction is Note (17) Funds from Dedicated Collections.

HUD's new internal controls identified and corrected an invalid posting logic in its Housing for the Elderly and Handicapped program. This program does not receive an appropriation from the General Fund of the U.S. Government; it receives offsetting collections throughout the year. The posting logic used was where an appropriation is received from the General Fund of the U.S. Government via Treasury Appropriation Warrant. The correction of error in the amount of $6 million impacted the following consolidated financial statements: the BS's Unexpended Appropriations and Cumulative Results of Operations-All Other lines and the SCNP's Unexpended Appropriations and Cumulative Results of Operations lines.

HUD corrected an abnormal cumulative operations balance in its Housing for the Elderly and Housing for the Disabled program accounts. The abnormal balances occurred due to an incorrect posting logic used to record some of the program's expenditures. The correction of errors are in the amounts of $14 million and $0.3 million respectively which impacted the following consolidated financial statements: the BS's Unexpended Appropriations and Cumulative Results of Operations-All Other lines and the SCNP's Unexpended Appropriations and Cumulative Results of Operations Corrections of Errors lines. The overall net impact on the BS and SCNP net position was zero.

In FY 2017, HUD implemented a subledger to general ledger clean-up project. During its clean-up efforts this fiscal year, HUD found there were accounts receivable balances that needed to be corrected for the Excess Rental Income program between the subledger and the general ledger. The correction of error in the amount of $.6 million impacted the following consolidated financial statements: the BS's Accounts Receivable, net and Cumulative Results of Operations-Funds from Dedicated Collection line and the SCNP's Cumulative Results of Operations Corrections of Errors line. The consolidated notes impacted by this correction are Note (6) Accounts Receivable, Net and Note (17) Funds from Dedicated Collections.

HUD's new internal controls identified and corrected subsidy expense for loan guarantees due to erroneous postings of Section 108 upfront fees to the account for the subsidy expense fee component. The error resulted in a $.6 million overstatement of subsidy expenses in Note (7) Sections L1 and L3. Two lines in Note (7) Section N were also impacted (Subsidy Expense - Fees and Other Collections & Adjustments - Fees Received) but the overall net impact on Note (7) Section N was zero. There was no impact on the financial statements.

In 2019, Ginnie Mae fully implemented its Subledger Database (SLDB) solution for its non-pooled assets (NPA) and completed audit remediation efforts associated with material weaknesses over reporting of non-pooled loan portfolio balances. This accomplishment was highlighted by, but not limited to: (i) developing and enhancing Ginnie Mae's accounting and modeling infrastructure; (ii) working with third-party servicers to develop standardized loan-level reporting detail and implement accounting policies compliant with U.S. GAAP; (iii) designing, developing and implementing new technologies to track and account for the non-pooled loans; (iv) developing and implementing standard operating procedures for non-pooled assets to comply with existing accounting policies; and (v) enhancing the internal controls over financial reporting.

The implementation and remediation project culminated with the launch of Ginnie Mae's SLDB solution. The SLDB solution provides Ginnie Mae with the capability to translate loan servicing data into loan-level accounting entries in an integrated subledger to support appropriate accounting treatment in accordance with U.S. GAAP and Ginnie Mae's accounting policies. The implementation of the SLDB solution required significant enhancements to Ginnie Mae's models and modeling processes, new interfaces and protocols for data processing and movement, and far-reaching changes to the way Ginnie Mae personnel performs the critical accounting, reporting, data processing, technology support and oversight tasks required to track and report the non-pooled asset portfolio.

In addition to the non-pooled asset errors, Ginnie Mae also adjusted the opening balances of accounts receivable to reflect the gross accounts receivable for criminal restitution, along with an offsetting allowance for amounts not expected to be collected, in order to comply with GAAP requirements related to the accounting for criminal restitution.

Ginnie Mae recorded prior period adjustments to correct the accounting errors described above. The correction of error impacted the following Balance Sheet line items: $19 million increase in Accounts Receivables, Net, $69 million decrease in Other Non-Credit Reform Loans, $2 million increase in Accounts Payable, and $29 million increase in Contingent Liabilities (Loss Reserves). The correction of error also impacted the following Statement of Changes in Net Position line items: $81 million decrease in Beginning Balance Adjustments - Corrections of Errors line.

Changes in Accounting Principles

Ginnie Mae has determined that Ginnie Mae's guaranty program is an insurance program as defined in *SFFAS No. 51: Insurance Programs*. *SFFAS No. 51* became effective for all agencies beginning in fiscal year 2019. Pursuant to *SFFAS No. 51* requirements, agencies are to record a liability for loss on remaining coverage of the agencies' insurance program. Ginnie Mae previously did not recognize non-contingent liabilities associated with the guaranty program or amounts related to guaranty fees expected to be received in future periods since previous GAAP standards required only the contingent liability under *SFFAS No. 5* to be reported when guaranty costs became probable and measurable due to impending default of an issuer. Ginnie Mae implemented *SFFAS No. 51* effective as of the beginning of fiscal year 2019. This implementation resulted in an adjustment to increase Beginning Balance Adjustments - Changes in Accounting Principles by $50 million in the Statement of Changes in Net Position, with a corresponding decrease in Contingent Liabilities (Loss Reserves) of $50 million in the Balance Sheet. See Note (25) *Insurance Program* for additional information.

The FASAB issued *SFFAS No. 48* and *SFFAS No. 50*, which permit alternative methods in establishing opening balances and are effective for periods beginning after September 30, 2016 with early implementation allowed. HUD used the principles of these accounting standards for FY 2019 to establish an opening balance for Internal Use Software as part of HUDs' General Property, Plant, and Equipment.

During FY 2019, HUD decreased its beginning Cumulative Results of Operation on the Consolidated SCNP for HUDs' General Property, Plant, and Equipment for Internal Use Software utilizing *SFFAS No. 50* by $332 million through a prior period adjustment. This entry also impacted the ending balance of HUDs' General Property, Plant, and Equipment by decreasing the balance to $5 million.

Note 2: Non-Entity Assets

Non-entity assets consist of assets that belong to other entities but are included in the HUD consolidated financial statements and are offset by various liabilities to accurately reflect the Department's net position. The Department's non-entity assets principally consist of 1) FHA's downward re-estimates and negative subsidies in the General Fund receipt accounts for the General Insurance (GI) fund, 2) escrow monies collected by FHA that are either deposited at Treasury or in minority-owned banks or invested in Treasury securities, 3) capital transfers to the General Fund of the Treasury from the Housing for the Elderly and Disabled Liquating Fund, 4) sustained audit receivables and court-enforced restitution in HUD's miscellaneous receipt account, 5) Emergency Home Loan Program (EHLP) receivables in the General Fund receipt account, 6) unclaimed MBS security holder payments held by Ginnie Mae, and 7) cash remittances from Section 8 bond refunding deposited in the General Fund of the Treasury.

HUD's non-entity assets were as follows:

Note 2: Non-Entity Assets For The Year Ended September 30, 2019 (Dollars in Millions)		
Intragovernmental		
Fund Balance with Treasury	$	62
Total Intragovernmental	**$**	**62**
Public		
Cash and Other Monetary Assets	$	23
Accounts Receivable, Net		166
Loan Receivables and Related Foreclosed Property, Net		103
Total Public	**$**	**292**
Total Non-Entity Assets	**$**	**354**
Total Entity Assets	**$**	**217,226**
Total Assets	**$**	**217,580**

Note 3: Fund Balance with Treasury

Treasury performs cash management activities for all Federal agencies. The net activity represents Fund Balance with Treasury (FBWT). HUD's fund balances by fund type is as follows:

Note 3: Fund Balance with Treasury For The Year Ended September 30, 2019 (Dollars in Millions)		
Status of Fund Balance with Treasury		
Unobligated Balance		
Available	$	47,217
Unavailable		8,476
Obligated Balance not yet Disbursed	$	55,021
Non-Budgetary FBWT	$	29
Total	**$**	**110,743**

The Department's Fund Balance with Treasury includes receipt accounts established under current Federal Credit Reform legislation and cash collections deposited in restricted accounts that cannot be used by HUD for its programmatic needs. These designated funds established by the Department of Treasury are classified as suspense and/or deposit funds and consist of accounts receivable balances due from the public. An SBR is not prepared for these funds since any cash remittances received by the Department are not defined as budgetary resources.

Obligated and unobligated balances reported for the Status of Fund Balance with Treasury do not agree with obligated and unobligated balances reported in the Combined SBR because the budgetary balances reported in the Combined SBR

are also supported by amounts other than FBWT, such as investments, borrowing authority, and budgetary receivables. Additionally, the unobligated balances include collections related to Ginnie Mae which are not available to HUD unless approved by Congress. For additional disclosures on HUD's FBWT restrictions, see Note (18) Legal Arrangements Affecting the Use of Unobligated Balances for additional information.
In addition to FBWT, contract and investment authority are also a part of HUD's funding sources. Contract authority permits an agency to incur obligations in advance of an appropriation, offsetting collections, or receipts to make outlays to liquidate the obligations. HUD has permanent, indefinite contract authority. Since Federal securities are considered the equivalent of cash for budget purposes, investments in them are treated as a change in the mix of assets held, rather than as a purchase of assets.
An immaterial difference exists between HUD's recorded Fund Balances with Treasury and Treasury's records. To be consistent with Treasury's guidance, the Department temporarily adjusts its records to agree with Treasury's balances at the end of the accounting period. The adjustments are reversed at the beginning of the following accounting period. The immaterial differences are researched the following accounting period(s) for resolution.

HUD implemented a project in FY 2017 which identified differences between the general ledger and sub-ledger balances. As of September 30, 2019, HUD has resolved, researched and analyzed, a significant amount of current and historical balances.

Note 4: Cash and Other Monetary Assets

Cash and other monetary assets of FHA consist of escrow monies collected that are deposited in minority-owned banks and deposits in transit. As of September 30, 2019, escrow monies and deposits in transit were $87 million.

Cash and other monetary assets of Ginnie Mae, which are Funds from Dedicated Collections, consist of cash that is received by its Master Sub-servicers but has not yet been transmitted to Ginnie Mae. As of September 30, 2019, deposits in transit were $39 million.

Note 5: Investments

The U.S. Government non-marketable intra-governmental securities are comprised of short-term and long-term securities. Short-term securities have an original maturity date of less than one year. Long-term securities have an original maturity date of one year or greater. FHA invests in short and long-term securities. Ginnie Mae primarily invests in one-day overnight certificates that are issued with a stated rate of interest to be applied to their par value amount with a maturity date on the next business day.

The cost, estimated market value, and amortization method of investments in debt securities are as follows:

Note 5: Investments For The Year Ended September 30, 2019 (Dollars in Millions)						
	Cost	Amortization Method	Amortized (Premium)/ Discount, Net	Accrued Interest	Net Investments	Market Value
Treasury Bills	$ 29,768	Straight-Line	$ 260	$ -	$ 30,028	$ 30,102
Treasury Notes	20,235	Effective Interest	1	72	20,308	20,318
Overnight Securities	15,784	No Amortization	-	-	15,784	15,784
Total Investments	**$ 65,787**		**$ 261**	**$ 72**	**$ 66,120**	**$ 66,204**

The federal government does not set aside assets to pay future benefits or other expenditures associated with funds from dedicated collections. The dedicated cash receipts collected from the public into the fund are deposited in the U.S. Treasury, which uses the cash for general government purposes. Treasury securities are issued to Ginnie Mae with a stated rate of interest to be applied to the par value with a maturity date of the next business day and are measured at cost, which approximates fair value. Treasury securities are an asset to the Ginnie Mae and a liability to the U.S. Treasury. Because Ginnie Mae and the U.S. Treasury are both parts of the government, these assets and liabilities offset each other from the standpoint of the government as a whole. For this reason, they do not represent an asset or a liability in the U.S. government-wide financial statements.

Investments in Private-Sector Entities

Investments in private-sector entities are the result of FHA's Section 601 and Family Notes and Risk Sharing Debentures. Multifamily Risk Sharing Debentures [Section 542(c)] is a program available to lenders where the lender shares the risk in the property by issuing debentures for the claim amount paid by FHA on defaulted insured loans.

The following table presents financial data on FHA's investments in Risk Sharing Debentures:

Note 5: Investments For The Year Ended September 30, 2019 (Dollars in Millions)						
	Beginning Balance	Net Acquisitions	Share of Earnings or Loss	Return of Investment	Redeemed	Ending Balance
Securities Held Outside of Treasury	$ -	$ -	$ -	$ -	$ -	$ -
601 Program	-	-	-	-	-	-
Risk Sharing Debentures	8	-	-	-	(2)	6
Total	**$ 8**	**$ -**	**$ -**	**$ -**	**$ (2)**	**$ 6**

Note 6: Accounts Receivable, Net

The following table shows the accounts receivable balances as reflected on the Balance Sheet:

Note 6: Accounts Receivable, Net For The Year Ended September 30, 2019 (Dollars in Millions)	Gross Accounts Receivable	Allowance for Loss	Total, Net
Intragovernmental	$ -	$ -	$ -
Public			
FHA Partial Claims and Generic Debt Receivables	85	(41)	44
Ginnie Mae Fees and Interest Receivables	174	(6)	167
Other Receivables	298	(3)	295
Criminal Restitution	-	-	-
FHA Criminal Restitution	15	(8)	7
Ginnie Mae Criminal Restitution	89	(89)	-
Other Criminal Restitution	48	(49)	-
Total Accounts Receivable	**$ 709**	**$ (196)**	**$ 513**

The Department's Accounts Receivable represents FHA Partial Claims and Generic Debt Receivables, Ginnie Mae Fees, Interest Receivables and Reimbursable Cost Receivables, Other Receivables, and Criminal Restitutions.

FHA Partial Claims and Generic Debt Receivables

FHA Partial Claims are paid to mortgagees as part of its loss mitigation efforts to bring delinquent loans current for which FHA does not yet have the promissory note recorded. The Generic Debt is mainly comprised of receivables from various sources, the largest of which are Single-Family Claims, Single-Family Indemnification, and Single-Family Restitutions.

Ginnie Mae Fees, Interest and Reimbursable Cost Receivables

Accrued Fees and Interest Receivable, Net

Ginnie Mae Fees consists of accrued guaranty fees due from issuers. Guaranty fees are payable monthly based on outstanding UPB in Ginnie Mae-guaranteed MBS pools at the appropriate statutory rate. At September 30, 2019, Ginnie Mae's accrued fees totaled $112 million.

Ginnie Mae also accrues interest on mortgage loans held for investment at the contractual rate and records an allowance on accrued interest to the extent interest is uncollectable for conventional loans, and to the extent interest is not expected to be recovered per insurance guidelines for insured or guaranteed loans.

At September 30, 2019, Ginnie Mae's accrued interest receivable totaled $19 million, of which $17 million relates to FHA-insured loans, $1 million relates to uninsured loans, and the remaining $1 million relates to loans insured by VA and RD. The associated allowance at September 30, 2019 was $2 million. For the year ended September 30, 2019, the provision was $1 million.

Reimbursable Costs Receivable, Net

Ginnie Mae advances funds to preserve its interests in mortgaged property, such as advances to cover shortfalls for mortgagors' taxes and insurance when escrow balances are insufficient, or pre-foreclosure and foreclosure costs and other expenses, such as Homeowners Association fees incurred during the foreclosure process.

The following table presents reimbursable costs and related allowance amounts associated with loans serviced by Ginnie Mae, by loan insurance type:

Note 6: Accounts Receivable, Net
For The Year Ended September 30, 2019
(Dollars in Millions)

	FHA	VA	RD	Conventional	Total
Reimbursable Costs	$ 37	$ 2	$ 1	$ -	$ 40
Allowance for Reimbursable Costs	(4)	(1)	-	-	(5)
Reimbursable Costs, Net	**$ 33**	**$ 1**	**$ 1**	**$ -**	**$ 35**

The above table includes only reimbursable costs that are attributable to underlying loans and insuring agencies. Accordingly, $2 million of receivables due to Ginnie Mae from the MSS related to overpayments for reimbursable costs that were not required are not included in the total above but are included in the total amount disclosed for Ginnie Mae Fees, Interest and Reimbursable Cost Receivables.

For the year ended September 30, 2019, the provision for allowance for reimbursable costs was $5 million. A 100 percent allowance for loss is established for all delinquent accounts 90 days and over for bond refunding. The allowance for loss methodology adjusts the total delinquencies greater than 90 days by the effects of economic stress factors, which include likely payoffs, foreclosures, bankruptcies, and hardships of the project. Every quarter, adjustments to the bond refunding allowance for loss account are made to ensure the allowances continue to be necessary.

Other Receivables

The Other Receivables line item represents Section 8 year-end settlements, claims to cash from the public, state and local authorities for bond refunding, Section 236 excess rental income, sustained audit findings, refunds of overpayment, FHA insurance premiums, and foreclosed property proceeds. Sustained audit costs are costs that have been challenged by the OIG and agreed upon by HUD. These are generally questioned costs, these are costs that have been challenged during the audit and are categorized by ineligible and unsupported, costs.

A 100 percent allowance for loss is established for all delinquent accounts 90 days and over for bond refunding. The allowance for loss methodology adjusts the total delinquencies greater than 90 days by the effects of economic stress factors, which include likely payoffs, foreclosures, bankruptcies, and hardships of the project. Adjustments to the bond refunding allowance for loss account are done every quarter to ensure they are deemed to be necessary.

For Section 236 excess rental income, the allowance for loss consists of 10 percent of the receivables with a repayment plan plus 95 percent of the receivables without a repayment plan. Adjustments to the excess rental income allowance for loss account are done biannually to ensure they are deemed necessary.

Criminal Restitution

Pursuant to the most recent OMB *Circular A-136*, HUD must disclose separately any criminal restitution that is included in AR, it must include the gross amount of receivables related to criminal restitution orders monitored by HUD and the estimate of net realizable value determined to be collectible for criminal restitution orders monitored by HUD. HUD Proper has recorded a 100 percent allowance against the criminal restitution accounts receivables based on management's expectation that these amounts are not probable of collection.

Criminal Restitution are payments by an offender to the victim for the harm caused by the offender's wrongful acts. Courts have the authority to order convicted offenders to pay restitution to victims as part of their sentences. There are several primary stakeholders in the criminal debt data management process. In the judicial branch, stakeholders are the District Court Clerk's Office and the Probation Office, in the executive branch, the stakeholders are the Department of Justice which includes the U.S. Attorney's Office (USAO) and the Bureau of Prison (BOP). The USAO is statutorily responsible for the enforcement of the collections of criminal debt and the District Courts are responsible for receipting payments, disbursing restitution to victims, and tracking the debt.

FHA's Criminal Restitutions are defined as criminal remedies for false claims and statements that were not sufficiently responsive to curtailing the serious problem of substantial loss to the Government when individuals were allowed to receive federal funds or benefits to which they were not entitled. FHA has recorded a 51 percent allowance against the criminal restitution accounts receivables.

Ginnie Mae's Criminal Restitution represent amounts due to Ginnie Mae as a result of court order in connection with criminal proceedings against certain defendants, primarily for fraud and false claims. Ginnie Mae has recorded a 100 percent allowance against the criminal restitution accounts receivables based on management's expectation that these amounts are not probable of collection. This assessment is based on Ginnie Mae's position in the recovery hierarchy for debts from defendants, its historical experience with collections on these accounts, and the overall historical experience for the U.S. Government in collecting on this category of receivable.

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers

HUD reports pre-1992 direct loans and loan guarantees under the allowance for loss method. Under the allowance for loss method, the nominal amount of the direct loan is reduced by an allowance for uncollectable amounts. The liability for loan guarantees is the amount the agency estimates will more likely than not require a future cash outflow to pay default claims. Net loans receivable or the value of assets related to direct loans is not the same as expected proceeds from selling the loans.

Direct loan obligations and loan guarantee commitments made after FY 1991, and the resulting direct loans or loan guarantees, are governed by the FCRA, as amended. *SFFAS No. 2* requires that the present value of the subsidy costs, which arises from interest rate differentials, interest supplements, and defaults (net of recoveries, fee offsets and other cash flows) associated with direct loans and loan guarantees, be recognized as a cost in the year the direct or guaranteed loan is disbursed. Direct Loans are reported net of an allowance for subsidy at present value and loan guarantee liabilities are reported at present value.

The subsidy rates disclosed pertain only to the current fiscal year's cohorts. These rates cannot be applied to the direct loans and guarantees of loans disbursed during the current reporting year to yield the subsidy expense. The subsidy expense for new loans and loan guarantees reported in the current year result from disbursement of loans from both current year cohorts and prior year(s) cohorts. The subsidy expense reported in the current year also includes modifications and re-estimates.

A. List of HUD's Direct Loan and/or Guarantee Programs:

1. FHA
    a) GI/SRI Direct Loan Program
    b) MMI/CMHI Loan Guarantee Program
    c) GI/SRI Loan Guarantee Program
    d) H4H Loan Guarantee Program
2. Housing for the Elderly and Disabled
3. All Other
    a) Flexible Subsidy Fund
    b) Section 108 Loan Guarantees
    c) Indian Housing Loan Guarantee Fund
    d) Loan Guarantee Recovery Fund
    e) Native Hawaiian Housing Loan Guarantee Fund
    f) Title VI Indian Housing Loan Guarantee Fund
    g) Green Retrofit Direct Loan Program
    h) Emergency Homeowners' Loan Program

FHA

FHA programs are operated through three insurance funds, the Mutual Mortgage Insurance/Cooperative Management Housing Insurance (MMI/CMHI), General Insurance Risk and Special Risk Insurance (GI/SRI) and the HOPE for Homeowners (H4H) funds, with MMI fund being the largest.

Mutual Mortgage Insurance (MMI)/Cooperative Management Housing Insurance (CMHI)

The MMI Fund provides mortgage insurance on single-family mortgage loans made by FHA-approved lenders and strives to meet the needs of many first-time and minority homebuyers who, without the FHA guarantee, may find mortgage credit to be unaffordable or simply unavailable. Through MMI, FHA offers several types of single-family forward (traditional) mortgage insurance products and Home Equity Conversion Mortgages (HECM) (reverse mortgages) for seniors. Activity for the CMHI fund, which insures mortgages for multifamily cooperatives is also reported together with MMI.

General Insurance and Special Risk Insurance (GI/SRI)

The GI/SRI Fund provides mortgage insurance on multifamily rental housing and healthcare facilities, and single-family Title I manufactured housing and property improvement loans. GI/SRI programs are a critical component of FHA's efforts to meet the Nation's need for decent, safe and affordable housing.

GI/SRI's mortgage programs are designed to operate without the need for subsidy appropriations, with fees set higher than anticipated losses.

In FY 2015, FHA began an FFB Risk Sharing Program, an inter-agency partnership between HUD, FFB, and the Housing Finance Authorities (HFAs). The FFB Risk

Sharing program provides funding for multifamily mortgage loans insured by FHA. Under this program, FHA records a direct loan from the public and borrowing from FFB. The program does not change the basic structure of Risk Sharing Program; it only substitutes FFB as the funding source. The HFAs would originate and service the loans and share in any losses.

Prior to FY 2015, FHA's Direct Loans were a result of Purchase Money Mortgages (PMMs). The Direct loan receivables were primarily multifamily loans and are in the liquidating fund. In addition, FHA has a small amount of new PMMs that are administered by Single-Family Housing. Due to the small size, there is no subsidy associated with these loans.

HOPE for Homeowners (H4H)

This program was authorized under the *Housing and Economic Recovery Act* of *2008*. This program was effective for endorsements on or before September 30, 2011. The *H4H Act* was designed to prevent qualified homeowners from defaulting on their loans and avert foreclosure. This is done through refinancing into affordable, fixed-rate mortgages.

FHA Foreclosed Property:

The balance relating to foreclosures as of September 30, 2019 is comprised of only Single-Family properties. There are no Multifamily properties currently in inventory. The Secretary has the authority under the *National Housing Act (12 U.S.C §1710(g))* to manage or dispose of eligible HUD-owned property assets in a manner that will provide affordable, safe and sanitary housing to low-wealth families, preserve and revitalize residential neighborhoods, expand homeownership opportunities, minimize displacement of tenants residing in rental or cooperative housing, and protect the financial interest of the Federal Government.

Single-Family properties may be sold to eligible entities *(24 Code of Federal Regulations (CFR) §291.303)* through public asset sales. Eligibility of bidders will be determined by the Secretary and included in the bid package with a notice filed in the *Federal Register*. In addition, HUD must ensure that its policies and practices in conducting the single-family property disposition program do not discriminate on the basis of disability *(24 CFR §9.155(a))*.

For FHA foreclosed property, the average number of days in inventory for sold cases is 138 days in FY 2019. The total number of foreclosed properties on-hand as of September 30, 2019 is 7,606.

HUD Proper

HUD Proper's direct loan and/or guarantee programs are in the Housing for the Elderly and Disabled Programs and All Other Programs.

Housing for the Elderly and Disabled Program (HED)

The HED, Sections 202 and 811, were established by the *Housing Act of 1959* and the *National Affordable Housing Act of 1990* respectively to provide critical affordable housing to our nation's elderly and supportive housing for disabled very low-income persons. Assistance was provided to eligible private nonprofit organizations to cover construction, acquisition or rehabilitation expenses as well as rental assistance. There are three parts to the calculation of allowance for loss: Part one is the Loss rate for loans issued a Foreclosure Hearing Letter; Part two is the Loss rate for the estimated number of foreclosures in the current year; and Part three is the Loss rate for loans delinquent for more than 180 days. Loss rates for parts one and two are determined by actual historical data from the previous five years. Loss rates for part three are determined or approved by the Housing Office of Evaluation.

All Other Programs

The All Other have the following direct loan and/or loan guarantee programs: Flexible Subsidy Fund, Section 108 Loan Guarantees, Indian Housing Loan Guarantee Fund, Loan Guarantee Recovery Fund, Native Hawaiian Housing Loan Guarantee Fund, Title VI Indian Housing Loan Guarantee Fund, Green Retrofit Direct Loan Program, and Emergency Homeowners' Loan Program.

Flexible Subsidy Fund

The Flexible Subsidy Fund provided federal assistance for troubled multifamily housing projects which included supporting capital improvements to maintain these low to moderate income projects as authorized by *12 U.S. Code 1715z-1*. There are four parts to the calculation of allowance for loss: Part one is the Loss rate for loans written-off; Part two is the Loss rate for restructured loans; Part three is the Loss rate for loans paid-off; and Part four is the Loss rate for loans delinquent or without repayment activity for 30 years. Loss rates for parts one and three are based on actual historical data derived from the previous three years. The loss rates for parts two and four are provided by or agreed to by the Housing Office of Evaluation.

Section 108 Loan Guarantees

This is a loan guarantee provision of the CDBG program which is authorized by the *Housing and Community Development Act of 1974*, as amended *(42 USC 5308(a))*. Neither the statute nor the regulations limit the portion of the loan guaranteed to less than 100 percent of the principal amount. Under this section, HUD offers communities a source of financing for certain community development activities, such as housing rehabilitation, economic development, and large-scale physical development projects. The purpose is to reaffirm the commitment of the Federal Government to assist local governments in their efforts in stimulating economic and community development activities needed to combat severe economic distress and to help in promoting economic development activities needed to aid in economic recovery as well as promote revitalization and development projects undertaken by local governments that principally benefit persons of low and moderate income, the elimination of slums, and to meet urgent community needs, with special priority for projects located in areas designated as enterprise zones by the Federal Government or by any State.

Indian Housing Loan Guarantee Fund

This loan guarantee fund was established under the *Housing and Community Development Act of 1992* to facilitate homeownership and increase access to capital in Native American Communities. A home mortgage product specifically designed for American Indian and Alaska Native families, Alaska villages, tribes, or tribally designated housing entities. The purpose is to provide access to sources of private financing to Indian families, Indian housing authorities, and Indian tribes, who otherwise could not acquire housing financing because of the unique legal status of Indian lands. The Secretary may guarantee, not to exceed, 100 percent of the unpaid principal and interest due on any loan eligible under subsection (b) made to an Indian family, Indian housing authority, or Indian tribe.

Loan Guarantee Recovery Fund

This loan guarantee fund provides certain nonprofit organizations with a source of financing to rebuild property damaged or destroyed by acts of arson or terrorism. This loan guarantee provision was authorized under the *Church Arson Prevention Act of 1996*.

Native Hawaiian Housing Loan Guarantee Fund

This loan guarantee fund was established by the *Hawaiian Homelands Homeownership Act of 2000* that added a new *Section 184A* to the *Housing and Community Development Act of 1992* which authorized the Native Hawaiian Housing Loan Guarantee Program. The program is designed to offer homeownership, property rehabilitation, and new construction opportunities for eligible Native Hawaiian individuals and families wanting to own a home on Hawaiian homelands. The purpose of the *Section 184A* loan is to provide access to sources of private financing on Hawaiian homelands. *Section 184A* permits HUD to guarantee 100 percent of the unpaid principal and interest due on an eligible loan. The use of the *Section 184A* Loan Guarantee Program is limited to owner-occupant single-family dwellings located on Hawaiian homelands.

Title VI Indian Housing Loan Guarantee Fund

This loan guarantee fund assists Indian Housing Block Grant (IHBG) recipients in financing additional construction or development, including new housing, rehabilitation, infrastructure, community facilities, land acquisition, architectural and engineering plans, and financing costs. It was authorized by Title VI of *Native American Housing Assistance and Self Determination Act (NAHASDA) of 1996*. A guarantee made under Title VI of *NAHASDA* shall guarantee repayment of 95 percent of the unpaid principal and interest due on the notes or other obligations guaranteed.

Green Retrofit Direct Loan Program

This direct loan program was authorized by the *American Recovery and Reinvestment Act of 2009* to ensure that grants and loans are made available to eligible property owners to make energy and green retrofit investments in property and to maintain energy efficient technologies.

Emergency Homeowners' Loan Program

This direct loan program was authorized by the *Dodd-Frank Wall Street Reform and Consumer Protection Act*. It provides mortgage payment relief to eligible homeowners experiencing a drop-in income of at least 15 percent directly resulting from involuntary unemployment or underemployment due to adverse economic conditions and/or a medical emergency.

Current year adjustments were made in the EHLP Substantially Similar States Program Receipt Account (86 2891) and EHLP Direct Loan Financing Account (86X4357) for $91 million and $61 million respectively. These adjustments were made in Northridge Loan System (NLS) using current year accounts and interfaced to ARC's Oracle system Adjustments were needed because NLS was automatically writing off a percentage on each loan annually to bad debt expense for the two EHLP loan programs accounts mentioned above. The SMART system subledger, serviced by Housing in Oklahoma, was tracking each loan in accordance with the specific program requirements. As a result, the SMART system only wrote-off the loan balance when specific circumstances indicated that a write-off was eligible and appropriate for that loan. Because these two systems used different write-off methodologies and since the servicing system SMART is considered the system subsidiary of record for the EHLP Program, OCFO adjusted the write-off balances in NLS to bring the balances in sync with SMART after OCFO Accounting and Systems reconciled the two systems on a loan by loan basis. In addition, this activity was part of the sub-ledger reconciliation effort to reconcile the general ledger and NLS subsidiary ledger.

HUD Proper Foreclosed Property

The Indian Housing Loan Guarantee program had 124 foreclosed properties on-hand as of September 30, 2019. The average number of days in inventory for fee simple property (39 properties) is 121 days and 903 days for Indian Trust Land (85 properties). The following tables are an analysis of loan receivables, loan guarantees, liability for loan guarantees, and the nature and amounts of the subsidy costs associated with the loans and loan guarantees for September 30, 2019:

B. Direct Loans Obligated Prior to FY 1992 (Allowance for Loss Method)

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Loans Receivable, Gross	Interest Receivable	Allowance for Loan Losses	Foreclosed Property	Value of Assets Related to Direct Loans
Direct Loan Programs					
FHA					
b) GI/SRI Direct Loan Program	$ 8	$ 14	$ (4)	$ -	$ 18
Housing for the Elderly and Disabled	672	10	(10)	-	672
All Other					
b) Flexible Subsidy Fund	$ 311	$ 44	$ (36)	$ -	$ 319
Total	**$ 991**	**$ 68**	**$ (50)**	**$ -**	**$ 1,009**

C. Direct Loans Obligated After-1991

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Loans Receivable, Gross	Interest Receivable	Allowance for Subsidy Costs (Present Value)	Foreclosed Property	Value of Assets Related to Direct Loans
Direct Loan Programs					
FHA					
a) MMI/CMHI Direct Loan Program	$ -	$ -	$ -	$ -	$ -
b) GI/SRI Direct Loan Program	1,970	5	306	-	2,281
All Other					
a) Green Retrofit Program	$ 46	$ 1	$ (39)	$ -	$ 8
b) Emergency Homeowners' Relief Fund	60	-	(61)	-	(1)
c) EHLP Assigned Loans Receipt Account	103	-	-	-	103
Total	**$ 2,179**	**$ 6**	**$ 206**	**$ -**	**$ 2,391**

D. Total Amount of Direct Loans Disbursed (Post-1991)

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

Direct Loan Programs	
FHA Risk Sharing Program	$ 324
All Other	
a) Green Retrofit Program	$ (3)
b) Emergency Homeowners' Relief Fund	(2)
Total	**$ 319**

E. Subsidy Expense for Direct Loans by Program and Component

1. Subsidy Expense for New Direct Loans Disbursed

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Interest	Defaults	Fees	Other	Total
Direct Loan Programs					
FHA Risk Sharing Program	$ (66)	$ -	$ (1)	$ 17	$ (50)
All Other					
a) Green Retrofit Program	$ -	$ -	$ -	$ -	$ -
b) Emergency Homeowners' Relief Fund	-	-	-	-	-
Total	**$ (66)**	**$ -**	**$ (1)**	**$ 17**	**$ (50)**

2. Modifications and Re-estimates

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Total Modifications	Interest Rate Re-estimates	Technical Re-estimates	Total Re-estimates
Direct Loan Programs				
FHA Risk Sharing Program	$ -	$ -	$ (48)	$ (48)
All Other				
a) Green Retrofit Program	$ -	$ -	$ (3)	$ (3)
b) Emergency Homeowners' Relief Fund	-	-	(2)	(2)
Total	**$ -**	**$ -**	**$ (53)**	**$ (53)**

3. Total Direct Loan Subsidy Expense

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

Direct Loan Programs	
FHA Risk Sharing Program	$ (98)
All Other	
a) Green Retrofit Program	$ (3)
b) Emergency Homeowners' Relief Fund	(2)
Total	**$ (103)**

F. Subsidy Rates for Direct Loans by Program and Component

Budget Subsidy Rates for Direct Loans

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
Forms

	Interest	Defaults	Fees and Other Collections	Other	Total
FHA Risk Sharing Program	-17.29%	0.01%	-2.05%	4.95%	-14.38%
Green Retrofit Program (HUD Appropriation 86X4589)	41.00%	42.60%	0.00%	-1.30%	82.30%
Emergency Homeowners' Relief fund (HUD Appropriation 86X4357)	0.00%	0.00%	0.00%	97.70%	97.70%

G. Schedule for Reconciling Subsidy Cost Allowance Balances (Post-1991 Direct Loans)

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	FHA Programs	All Other Financing Only	Total
Beginning Balance, Changes, and Ending Balance			
Beginning Balance of Subsidy Cost Allowance	$ (203)	$ 47	$ (156)
Add: subsidy expense for direct loans disbursed during reporting years by component:			
(a) Interest rate differential costs	$ (66)	$ -	$ (66)
(b) Default Costs (net of recoveries)	-	-	-
(c) Fees and Other Collections	(1)	-	(1)
(d) Other Subsidy Costs	17	-	17
Total of the above subsidy expense components	**$ (50)**	**$ -**	**$ (50)**
Adjustments:			
(a) Loan Modifications	$ -	$ -	$ -
(b) Fees Received	1	-	1
(c) Foreclosed Properties Acquired	-	-	-
(d) Loans Written Off	-	59	59
(e) Subsidy Allowance Amortization	(3)	-	(3)
(f) Other	(3)	-	(3)
Ending balance of the subsidy cost allowance before re-estimates	**$ (258)**	**$ 106**	**$ (152)**
Add or subtract subsidy re-estimates by component:			
(a) Interest Rate Re-estimate	$ -	$ -	$ -
(b) Technical/default Re-estimate	(193)	(5)	(198)
Adjustment prior years' credit subsidy re-estimates	145	-	145
Total of the Above Re-estimate Components	**$ (48)**	**$ (5)**	**$ (53)**
Ending Balance of the Subsidy Costs Allowance	**$ (306)**	**$ 101**	**$ (205)**

H. Defaulted Guaranteed Loans from Pre-1992 Guarantees

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Defaulted Guaranteed Loans Receivable, Gross	Interest Receivable	Allowance for Loan and Interest Losses	Foreclosed Property, Net	Value of Assets Related to Defaulted Guaranteed Loans Receivable, Net
FHA					
MMI/CMHI					
a) Single Family	$ 16	$ -	$ (3)	$ 4	$ 17
b) Multi Family	-	-	-	-	-
c) HECM	-	-	-	-	-
GI/SRI					
a) Single Family	$ 1	$ -	$ (5)	$ 9	$ 5
b) Multi Family	1,422	243	(587)	(5)	1,073
c) HECM	3	-	(1)	(2)	-
Total	**$ 1,442**	**$ 243**	**$ (596)**	**$ 6**	**$ 1,095**

I. Defaulted Guaranteed Loans from Post-1991 Guarantees

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Defaulted Guaranteed Loans Receivable, Gross	Interest Receivable	Allowance for Subsidy Cost (Present Value)	Foreclosed Property, Net	Value of Assets Related to Defaulted Guaranteed Loans Receivable, Net
FHA					
MMI/CMHI					
a) Single Family	$ 12,705	$ -	$ (4,584)	$ 1,005	$ 9,126
b) Multi Family	-	-	-	-	-
c) HECM	15,010	10,799	(7,925)	142	18,026
GI/SRI					
a) Single Family	$ 410	$ -	$ (147)	$ 13	$ 276
b) Multi Family	735	-	(344)	19	410
c) HECM	4,685	2,860	(3,030)	152	4,667
H4H					
a) Single Family	$ 6	$ -	$ (3)	$ -	$ 3
All Other					
a) Indian Housing Loan Guarantee	$ -	$ -	$ -	$ 9	$ 9
b) Native Hawaiian Housing Loan Guarantee	-	-	-	-	-
Total	**$ 33,551**	**$ 13,659**	**$ (16,033)**	**$ 1,340**	**$ 32,517**
Total Credit Program Receivables and Related Foreclosed Property, Net					**$ 37,012**

J. Guaranteed Loans Outstanding

1. Guaranteed Loans Outstanding:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers For The Year Ended September 30, 2019 (Dollars in Millions)				
		Outstanding Principal Guaranteed Loans Face Value		**Amount of Outstanding Principal Guaranteed**
Loan Guarantee Programs				
FHA				
a) MMI/CMHI Funds	$	1,367,830	$	1,224,998
b) GI/SRI Funds		156,702		141,185
c) H4H Program		69		60
All Other	$	8,859	$	8,855
Total	**$**	**1,533,460**	**$**	**1,375,098**

2. Home Equity Conversion Mortgage Loans Outstanding:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers For The Year Ended September 30, 2019 (Dollars in Millions)						
		Current Year Endorsements		**Current Outstanding Balance**		**Maximum Potential Liability**
Loan Guarantee Programs						
FHA Programs	$	10,856	$	87,908	$	128,584

3. New Guaranteed Loans Disbursed:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers For The Year Ended September 30, 2019 (Dollars in Millions)				
		Principal of Guaranteed Loans, Face Value		**Amount of Principal Guaranteed**
FHA				
a) MMI/CMHI Funds	$	214,634	$	212,981
b) GI/SRI Funds		15,220		15,166
c) H4H Program		-		-
All Other	$	459	$	459
Total	**$**	**230,313**	**$**	**228,606**

K. Liability for Loan Guarantees

1. Liability for Loan Guarantees (Estimated Future Default Claims for Pre-1992 Guarantees):

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

Loan Guarantee Programs	Liabilities for Losses on Pre-1992 Guarantees, Estimated Future Default Claims	Liabilities for Loan Guarantees, for Post 1991 Guarantees, (Present Value)	Total Liabilities For Loan Guarantees
FHA Programs	$ -	$ 2,355	$ 2,355
All Other	-	159	159
Total	**$ -**	**$ 2,514**	**$ 2,514**

L. Subsidy Expense for Post-1991 Guarantees

1. Subsidy Expense for Loan Guarantees:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

Loan Guarantee Programs	Endorsement Amount	Interest Supplements	Default Component	Fees Component	Other Component	Subsidy Amount
FHA						
a) MMI/CMHI Funds, Excluding HECM	$ 214,634	$ -	$ 5,266	$ (14,153)	$ 2,016	$ (6,871)
b) MMI/CMHI Funds, HECM	10,856	-	426	(442)	-	(16)
c) GI/SRI Funds	15,220	-	120	(567)	-	(447)
d) H4H Program	-	-	-	-	-	-
All Other	$ -	$ -	$ 9	$ (7)	$ -	$ 2
Total	**$ 240,710**	**$ -**	**$ 5,821**	**$ (15,169)**	**$ 2,016**	**$ (7,332)**

2. Modification and Re-estimates:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Total Modifications	Interest Rate Re-estimates	Technical Re-estimates	Total Re-estimates
Loan Guarantee Programs				
FHA				
a) MMI/CMHI Funds	$ -	$ (129)	$ (17,051)	$ (17,180)
b) GI/SRI Funds	-	(34)	(108)	(142)
c) H4H Program	-	-	(18)	(18)
All Other	$ -	$ (3)	$ (79)	$ (82)
Total	**$ -**	**$ (166)**	**$ (17,256)**	**$ (17,422)**

3. Total Loan Guarantee Subsidy Expense

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Current Year
Loan Guarantee Programs	
FHA	
a) MMI/CMHI Funds	$ (24,067)
b) GI/SRI Funds	(589)
c) H4H Program	(18)
All Other	$ (80)
Total	**$ (24,754)**

M. Subsidy Rates for Loan Guarantees by Programs and Component

Budget Subsidy Rates for Loan Guarantees:

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers
For The Year Ended September 30, 2019
(Dollars in Millions)

	Default	Fees and Other Collections	Other	Total
MMI/CMHI Funds				
Single Family - Forward	3.58%	-6.79%	0.00%	-3.21%
Single Family - HECM	4.45%	-4.60%	0.00%	-0.15%
Multi Family - Default CMHI (Cooperatives)	3.58%	-6.79%	0.00%	-3.21%
GI/SRI Funds				
Title I - Manufactured Housing	6.09%	-9.96%	0.00%	-3.87%
Title I - Property Improvements	4.43%	-5.43%	0.00%	-1.00%
Apartments - NC/SC 10/1/18-05/13/19	1.34%	-1.54%	0.00%	-0.20%
Apartments - NC/SC Current	1.34%	-1.53%	0.00%	-0.19%
Tax Credit Projects 10/1/18-05/13/19	0.26%	-2.75%	0.00%	-2.49%
Tax Credit Projects Current	0.26%	-2.73%	0.00%	-2.47%
Apartments - Refinance	0.09%	-3.36%	0.00%	-3.27%
HFA Risk Share	0.01%	-0.23%	0.00%	-0.22%
Other Rentals 10/1/18-05/13/19	0.65%	-1.54%	0.00%	-0.89%
Other Rentals Current	0.65%	-1.52%	0.00%	-0.87%
Healthcare				
FHA Full Insurance - Health Care	1.47%	-7.28%	0.00%	-5.81%
Health Care Refinance	0.94%	-6.17%	0.00%	-5.23%
Hospitals	1.46%	-7.05%	0.00%	-5.59%
Other HUD Programs				
CDBG, Section 108(b)	0.64%	-0.64%	0.00%	0.00%
Loan Guarantee Recovery Fund	50.00%	0.00%	0.00%	50.00%
Indian Housing Loan Guarantee Fund	3.41%	-3.86%	0.71%	0.26%
Hawaiian Home Guarantee Loan Fund	0.68%	-1.00%	0.00%	-0.32%
Title VI Indian Housing Loan Guarantee	11.26%	0.00%	0.00%	11.26%

N. Schedule for Reconciling Loan Guarantee Liability Balances (Post-1991 Loan Guarantees)

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers For The Year Ended September 30, 2019 (Dollars in Millions)	
Beginning balance of the loan guarantee liability	$ 19,333
Add: subsidy expense for guaranteed loans disbursed during the reporting years by component:	
(b) Default costs (net of recoveries)	$ 5,821
(c) Fees and Other Collections	(15,169)
(d) Other subsidy costs	2,016
Total of the above subsidy expense components	**$ (7,332)**
Adjustments:	
(b) Fees Received	$ 14,158
(d) Foreclosed Properties and Loans Acquired	15,960
(e) Claims Payments to Lenders	(21,633)
(f) Interest Accumulation on the Liability Balance	(429)
(g) Other	92
Ending Balance of the Loan Guarantee Liability before reestimates	**$ 20,149**
Add or Subtract subsidy re-estimates by component:	
(a) Interest Rate Reestimate	$ (166)
(b) Technical Default Reestimate	(11,854)
(c) Adjustment of prior years' credit subsidy reestimates	(5,402)
Total of the above re-estimate components	**$ (17,422)**
Ending Balance of the Loan Guarantee Liability	**$ 2,727**
Adjustment for Unrealized Ginnie Mae claims from defaulted loans	**$ (213)**
Ending Balance of the Loan Guarantee Liability	**$ 2,514**

O. Administrative Expenses

Note 7: Direct Loans and Loan Guarantees, Non-Federal Borrowers For The Year Ended September 30, 2019 (Dollars in Millions)	
Loan Guarantee Programs	
FHA	$ 748
All Other	-
Total	**$ 748**

Note 8: Other Non-Credit Reform Loans

The following table shows HUD's Other Non-Credit Reform Loans Receivable:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	Ginnie Mae Reported Balances (Gross)	Ginnie Mae Allowance	Ginnie Mae Reported Balances	Allowance for Loan Losses Due to Payment of Probable Claims by FHA	ONCRL Value of Assets Related to Loans
Mortgage Loans Held for Investment	$ 2,485	$ (143)	$ 2,342	$ (195)	$ 2,147
Advances Against Defaulted Mortgage-Backed Security Pools, Net	1	-	1	-	1
Properties Held for Sale, Net	10	-	10	-	10
Claims Receivable	-	-	-	-	-
Foreclosed Property	204	(34)	170	(16)	154
Short Sale	3	-	3	(2)	1
Total	$ 2,703	$ (177)	$ 2,526	$ (213)	$ 2,313

Other Non-Credit Reform Loans consist of Ginnie Mae Advances, Mortgage Loans Held for Investment, Claims Receivable, and Properties Held for Sale. Ginnie Mae has applied *SFFAS No. 34: The Hierarchy of Generally Accepted Accounting Principles* in the accounting and presentation of its Other Non-Credit Reform Loans as the accounting treatment for these transactions are not specified in FASAB and its related guidance. Ginnie Mae Other Non-Credit Reform Loans disclosures below are presented in accordance with guidance in FASB *ASC 310: Receivables*, *ASC 820: Fair Value Measurement, ASC 825: Financial Instruments, ASC 835: Interest,* as well as relevant industry practices based on the U.S. Securities and Exchange Commission's Regulation S-X. Below is a description of each type of asset recorded by Ginnie Mae and associated disclosures.

A. Advances, Net

Advances include payments made to cover any shortfalls to investors resulting from mortgagors defaulting on their mortgage payments, and to active issuers under special assistance programs where Ginnie Mae may assist issuers with pass through payments if issuer have a qualifying portfolio. Advances are reported net of an allowance, which is based on management's expectations of future collections from issuers, mortgagors, or recoverability from third-party insurers such as FHA.

During the year ended September 30, 2019, 3 issuers defaulted, and were subsequently terminated and extinguished. Ginnie Mae assumed the servicing rights and obligations of the issuers and advanced funds to the MSS throughout 2019 to cover P&I not yet paid by mortgagors, but due to the MBS investors.

Ginnie Mae's advances are presented netted in accordance with guidance within *ASC 310: Receivables*. The net carrying value of the advances balance is $1 million at September 30, 2019 with immaterial allowance for uncollectable advances.

B. Mortgage Loans Held for Investment, Net

Ginnie Mae classifies loans as either HFS or HFI. At September 30, 2019, Ginnie Mae's loan portfolio did not include any HFS loans. Ginnie Mae initially reports the carrying value of HFI loans at the recorded investment of the mortgage loan, which represents the UPB along with accrued interest, net of cost basis adjustments, and net of allowance for loan losses.

These HFI loans are periodically evaluated for impairment in accordance with guidance in *SFFAS No. 1: Accounting for Selected Assets and Liabilities – Accounts Receivable and SFFAS No. 5: Accounting for Liabilities of the Federal Government – Contingencies or ASC 310-10-35: Receivables – Overall.* Ginnie Mae's credit risk exposure on its HFI mortgage loans portfolio is limited by the underlying guaranty or insurance on loans, which may include FHA, RD, VA, and PIH.

For the year ended September 30, 2019, Ginnie Mae purchased $7 million of HFI out of the MBS pools from terminated and extinguished issuers.

The table below presents the carrying value of HFI loans including accrued interest broken down by underlying insuring agencies:

8B1 Mortgage Loans Held for Investment, Net:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	Conventional	FHA	VA	RD	Total
Mortgage Loans Held for Investment UPB	$ 133	$ 2,203	$ 105	$ 44	$ 2,485
Accrued Interest Receivable	1	16	1	-	18
Total Recorded Investment in Loans	**$ 134**	**$ 2,219**	**$ 106**	**$ 44**	**$ 2,503**
Allowance for Loan Losses	$ (4)	$ (134)	$ (4)	$ (2)	$ (144)
Mortgage Loans Held for Investment, Net	**$ 130**	**$ 2,085**	**$ 102**	**$ 42**	**$ 2,359**

Note that carrying value above includes UPB, accrued interest and associated allowances. Accrued interest and associated allowances are included and disclosed in Note (6) Accounts Receivable, Net, under Ginnie Mae Fees and Interest Receivable line item. Disclosures included in tables 8B2, 8B6 and 8B7 are presented in terms of total recorded investment which reconciles to the disclosed recorded investment per the table above.

B2. Credit Quality Indicators

When estimating defaults, prepayments and recovery, Ginnie Mae considers a number of indicators including macro-economic factors such as interest rates, home price indices, and unemployment rates. In addition, Ginnie Mae considers a number of credit quality indicators such as loan-to-value (LTV) ratios, current delinquency status, and recent payment history over the past twelve months.

Ginnie Mae's Credit Quality Indicators are presented in accordance with guidance within ASC 310: *Receivables.* The recorded investment for mortgage loans by original LTV ratio was as follows:

Table 8B2 Recorded Investment for Mortgage Loans by Original LTV Ratio:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	Less than 80%	80 to 100%	Greater than 100%	Total
Conventional	$ 9	$ 120	$ 5	$ 134
FHA	147	2,032	40	2,219
VA	7	77	22	106
RD	1	32	11	44
Total	**$ 164**	**$ 2,261**	**$ 78**	**$ 2,503**

B3. Impaired Loans

Ginnie Mae's impaired loans include TDR and PCI loans. Ginnie Mae measures impairment based on the present value of expected future cash flows for each loan classified as TDR or PCI.

Ginnie Mae's Impaired Loans are presented in accordance with guidance in *ASC 310: Receivables*. The number of loans, recorded investment, related allowance, UPB, average recorded investment, and total interest income recognized for impaired mortgage loans at September 30, 2019 by underlying insurance agencies were as follows:

Table 8B3 - Number of loans, recorded investment, related allowance, UPB, average recorded investment, and total interest income recognized for impaired mortgage loans:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	Recorded Investment	Related Allowance	Unpaid Principal Balance	Average Recorded Investment	Total Interest Income Recognized
With Related Allowance Recorded:					
Conventional	$ 48	$ (3)	$ 48	$ 50	$ 2
FHA	1,510	(130)	1,502	1,560	68
VA	71	(4)	71	74	3
RD	29	(3)	28	30	2
Total Impaired Loans with Related Allowance Recorded	**$ 1,658**	**$ (140)**	**$ 1,649**	**$ 1,714**	**$ 75**
With No Related Allowance Recorded:					
Conventional	$ 15	$ -	$ 15	$ 18	$ -
FHA	319	-	314	363	13
VA	35	-	34	44	2
RD	16	-	16	19	1
Total Impaired Loans with No Related Allowance Recorded	**$ 385**	**$ -**	**$ 379**	**$ 444**	**$ 16**
Total Impaired Loans	**$ 2,043**	**$ (140)**	**$ 2,028**	**$ 2,158**	**$ 91**

Within the table above, interest income on impaired loans is recognized subject to Ginnie Mae's non-accrual policy (as applicable), as discussed in Note (1) Summary of Significant Accounting Policies. The recorded investment, related allowance, and UPB for TDRs was $1,989 million, $139 million, and $1,975 million respectively, at September 30, 2019. The recorded investment, related allowance, and UPB for PCI loans was $54 million, $1 million, and $54 million respectively. Note that the total of the TDRs and PCI loans above agree to the total "impaired loans" shown in the table above.

B4. Troubled Debt Restructuring

A restructuring of a debt constitutes a TDR if Ginnie Mae, for economic or legal reasons related to the debtor's financial difficulties, grants a concession to the debtor that it would not otherwise consider. Additionally, Chapter 7 Bankruptcies which result in a discharge to the borrower are considered TDR loans by Ginnie Mae, because the borrower is undergoing financial difficulty or insolvency and concessions are made to the borrower.

Based on Ginnie Mae's modification programs, most of the loan modifications that Ginnie Mae completes result in term extensions, interest rate reductions (lower than what the mortgagor would receive in the market at the time of the modification) or a combination of both concessions. Ginnie Mae considers these modifications a concession to mortgagors experiencing financial difficulties and therefore classifies these loans as TDRs.

The average term extension granted by Ginnie Mae was 118 months for the year ended September 30, 2019. The average interest rate reduction was 1.12 percentage points for the year ended September 30, 2019.

Ginnie Mae's Troubled Debt Structuring is presented in accordance with guidance in *ASC 310: Receivables*. The number of loans and recorded investment of loans newly classified as a by underlying insurance agencies were as follows:

Table 8B4 - Number of loans and recorded investment of loans newly classified as a TDR:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	Number of Loans	Recorded Investment
Conventional	13	$ 1
FHA	171	22
VA	9	1
RD	8	1
Total	**201**	**$ 25**

The number of loans and total recorded investment at September 30, 2019 for the loans that entered a TDR in the preceding year and for which there was a payment default:

Table 8B4A - Number of loans and total recorded investment for the loans that entered a TDR in the preceding twelve months and for which there was a payment default during the period:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollar in Millions)

	Number of Loans	Recorded Investment
Conventional	13	$ 1
FHA	154	20
VA	8	1
RD	8	1
Total	**183**	**$ 23**

B5. Purchased Credit-Impaired Loans

Upon acquisition, if the purchased loan is delinquent and is not guaranteed or insured by FHA, Ginnie Mae concludes that it is probable that it will not collect all contractually required payments receivable. Accordingly, these loans are considered PCI mortgage loans.

Historically, Ginnie Mae has not applied the PCI guidance to its loans purchased with evidence of credit deterioration due to data and infrastructure constraints. Currently, upon acquisition, the PCI loans are recorded at UPB, less allowance. Ginnie Mae measures subsequent impairment on these loans based on the present value of expected future cash flows. Refer to Note (1) Summary of Significant Accounting Policies for more information.

Ginnie Mae does not consider delinquent FHA guaranteed or insured acquired loans as PCI because the UPB and the majority of the delinquent accrued interest are deemed collectible per the FHA insurance reimbursement guidelines. The FHA insurance is inseparable from the underlying loan and remains with the loan upon transfer or disposition.

For the year ended September 30, 2019, there were $1 million purchases of loans classified as PCI. Due to its current approach, Ginnie Mae does not have the data to disclose the accretable yield for PCI mortgage loans. Additionally, Ginnie Mae does not have the data to disclose the cash flows expected to be collected, and fair value at the acquisition date for the loans acquired during the period.

B6. Aging Analysis

Ginnie Mae's Aging Analysis is presented in accordance with guidance within *ASC 310: Receivables.* An aging analysis of the total recorded investment in Ginnie Mae's HFI mortgage loans by underlying insuring agency includes accrued interest (which is separately classified in Note (6) Accounts Receivable, Net) follows:

Table 8B6 - Aging Analysis of the Total Recorded Investment in Ginnie Mae's HFI Mortgage Loan:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

	One Month Delinquent	Two Months Delinquent	Three Months Delinquent	Four Months or More Delinquent	Total Delinquent	Current	Total	Loans Over 90 Days Delinquent and Accruing Interest	Recorded Investment in Non-accrual Loans
Conventional	$ 12	$ 5	$ 1	$ 13	$ 31	$ 103	$ 134	$ -	$ 24
FHA	278	100	28	317	723	1,496	2,219	317	-
VA	12	4	3	25	44	62	106	25	-
RD	5	3	1	9	18	26	44	9	-
Total	**$ 307**	**$ 112**	**$ 33**	**$ 364**	**$ 816**	**$ 1,687**	**$ 2,503**	**$ 351**	**$ 24**

B7. Foreclosures in Process

Physical possession of residential real estate property is achieved when either the creditor obtains legal title to the residential real estate property upon completion of a foreclosure or the mortgagor conveys all interest in the residential real estate property through completion of a deed in lieu of foreclosure in order to satisfy that loan.

Ginnie Mae accounts for the mortgage loans as Foreclosure in Process if the foreclosure has been filed but not completed. Although foreclosure has been filed, the foreclosure process has not been completed and Ginnie Mae has not received physical possession of the underlying property, and accordingly, Foreclosure in Process loans are accounted for similar to mortgage loans HFI and are reported as a part of the HFI portfolio.

Ginnie Mae's Foreclosures in Process is presented in accordance with guidance within *ASC 310: Receivables.* There were 1,029 properties for which formal foreclosure proceedings are in process with a recorded investment of $160 million as of September 30, 2019.

B8. Allowance for Loan Losses

Ginnie Mae maintains an allowance for probable incurred losses related to non-pooled mortgage loans. The allowance for loan losses involves significant management judgment and estimates of credit losses inherent in the mortgage loan portfolio. The allowance for loan losses is intended to reduce the carrying value of Ginnie Mae's HFI and related accrued interest for probable credit losses embedded in the loan portfolio at the balance sheet date. HFI and accrued interest are reported net of the allowance on the Balance Sheet as part of Other Non-Credit Reform Loans, Net and Accounts Receivable, Net lines, respectively.

Ginnie Mae relies on MSS reports for information to assess mortgagors' ability to pay current economic environment assessment, and potential insurance recoveries as determinants in the statistical models that evaluate HFI collectability. Homogeneous pools of mortgage loans are defined on common characteristics such as LTV ratios, loan product type, insurance type, and geographic region.

The projections are built based on actual loan performance data, current economic environment, and management judgment. Ginnie Mae monitors its projections of claim recoveries regularly to validate reasonableness. Ginnie Mae validates and updates its models and assumptions to capture changes in Ginnie Mae's servicing experience and changes in government policies and programs. When estimating defaults, prepayments and recoveries, Ginnie Mae considers a number of indicators including macro-economic factors such as interest rates, home price indices, and unemployment rates. In addition, Ginnie Mae considers a number of credit quality indicators such as LTV ratios, current delinquency status, and recent payment history. Other characteristics include age of loan, year of origination, insuring agency, spread of mortgage rate to relevant market rate, and payment structure. Ginnie Mae uses probability of default and probability of prepayment models which employ logistic regressions to calculate dynamic default and prepayment probabilities based on actual loan performance data for Ginnie Mae's loan population and macroeconomic conditions.

Ginnie Mae's Allowance for Loan Losses are presented in accordance with guidance within ASC 310: *Receivables*. The total recorded investment and allowance for loan losses by allowance methodology at September 30, 2019 were as follows:

Table 8B8 - Allowance for Loan Losses:

Note 8: Other Non-Credit Reform Loans For The Year End September 30, 2019 (Dollars in Millions)	
Recorded Investment:	
Collectively Evaluated	$ 461
Individually Evaluated	1,988
Purchase Credit Impaired	54
Total Recorded Investment in Loans	**$ 2,503**
Ending Balance of the Allowance for Loan Losses:	
Collectively Evaluated	$ (4)
Individually Evaluated	(139)
Purchase Credit Impaired	(1)
Total Allowance for Loan Losses	**$ (144)**
Net Investment in Mortgage Loans HFI	**$ 2,359**

Note that recorded investment above includes UPB, accrued interest and associated allowances. Accrued interest and associated allowances are included in Note (6) Accounts Receivable, Net.

The changes in Ginnie Mae's allowance for loan losses during the year were as follows:

Table 8B8(1) Changes in Allowance for Loan Losses:

Note 8: Other Non-Credit Reform Loans For The Year End September 30, 2019 (Dollars in Millions)	
	YTD as of September 2019
Beginning Balance	$ (209)
Recapture (provision) for Loan Losses	58
Charge Offs	12
Recoveries	(5)
Ending Balance	**$ (144)**

As discussed in Note (1) Summary of Significant Accounting Policies, Ginnie Mae determines the allowance for loan losses on a collective basis for whole loans under *SFFAS No. 1* and *SFFAS No. 5,* and determines the allowance under FASB *ASC 310 Receivables* for its impaired loans, in accordance with *SFFAS No. 34: The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board.*

Ginnie Mae's charge offs may include write downs recorded when the mortgage loan receivables are transferred between certain asset classes. Ginnie Mae's recoveries may include miscellaneous adjustments and charge offs reversals. During fiscal year 2019, Ginnie Mae began to receive and process the required information and account for charge-offs and recoveries on a prospective basis.

A. Claims Receivable, Net

Claims receivable are balances owed to Ginnie Mae from insuring or guaranteeing agencies (FHA, VA, RD, and PIH) related to conveyed properties and short sales. Short sales receivable represents payments owed to Ginnie Mae by insuring or guaranteeing agencies for properties where the net proceeds from a short sale are insufficient to repay amounts owed by the borrower, in accordance with the respective agency guidelines. Foreclosed property claims receivable represent amounts Ginnie Mae expects to receive from insuring or guaranteeing agencies for properties where Ginnie Mae has received title in lieu of foreclosure and intends to convey such title to the insuring or guaranteeing agency. Ginnie Mae records an allowance that represents the expected claims amounts which will not be recovered. Ginnie Mae's Claims Receivable is presented in accordance with guidance within *ASC 310: Receivables.*

Ginnie Mae's foreclosed property and short sale claims receivable and related allowance, were:

Table 8A1. Claims Receivable, Net

Note 8: Other Non-Credit Reform Loans For The Year Ended September 30, 2019 (Dollars in Millions)				
	FHA	**VA**	**RD**	**Total**
Foreclosed Property Claims Receivable	$ 192	$ 7	$ 5	$ 204
Short Sale Claims Receivable	2	1	-	3
Allowance for Claims Receivable	(31)	(2)	(1)	(34)
Claims Receivable, Net	**$ 163**	**$ 6**	**$ 4**	**$ 173**

The foreclosed property claims, and short sale claims allowance balances are estimated based on underlying insuring or guaranteeing agency guidelines, and historical collectability experience.

The allowance for claims receivable includes effects of charge offs and recoveries. A claims receivable is recognized for the amount recoverable from the insurers and any excess amounts not recoverable are charged off against the allowance for loan losses. The amount of claims receivable not reimbursed by insuring or guaranteeing agencies is charged off against the allowance for claims receivable. If the claim proceeds received exceed the claims receivable's carrying amount, Ginnie Mae will apply the excess to amounts previously charged-off (i.e., recovery) with any residual amounts recognized as a gain.

B. Properties Held for Sale, Net

Ginnie Mae records properties held for sale or “acquired property” when it obtains marketable title to the underlying property after the foreclosure process is complete or the date on which Ginnie Mae received marketable title to the property through a deed-in-lieu of foreclosure. The acquired properties are typically either RD insured, VA insured or uninsured conventional loans. Acquired properties are assets that Ginnie Mae intends to sell and is actively marketing through the MSS. Ginnie Mae initially recognizes acquired property at its initial fair value less estimated costs to sell the property. This requires Ginnie Mae to make significant estimates in determining the fair value of acquired properties at acquisition.

Ginnie Mae uses fair value measurements under *ASC 820: Fair Value Measurements* for the initial recognition of assets and liabilities and periodic re-measurement of certain assets and liabilities on a recurring or non-recurring basis. *ASC 820: Fair Value Measurements* defines fair value, establishes a framework for measuring fair value, and sets forth disclosure requirements regarding fair value measurements. This guidance applies whenever other accounting guidance requires or permits assets or liabilities to be measured at fair value. Fair value measurement assumes that the transaction to sell the asset or transfer the liability takes place either in the principal market for the asset or liability, or, in the absence of a principal market, in the most advantageous market for the asset or liability.

In determining fair value, Ginnie Mae uses various valuation techniques. The inputs to the valuation techniques are categorized into a three-level hierarchy, as described below:

Level 1: Quoted prices in active markets for identical assets or liabilities that are accessible at the measurement date.
Level 2: Observable inputs other than Level 1 prices, such as quoted prices for similar assets or liabilities, quoted prices in markets that are not active, or other inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities.
Level 3: Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities.

Ginnie Mae subsequently measures acquired properties at the lower of cost or market “LOCOM”. Ginnie Mae recognizes any subsequent write-downs of the property to its fair value less estimated costs through a valuation allowance with an offsetting charge to “Expense (income) on acquired property” included in gross cost in the SNC. Any recoveries for subsequent increases in fair value less estimated costs to sell are recognized up to the cumulative loss previously recognized through the valuation allowance.

Ginnie Mae applies the following valuation waterfall methodology in estimating the fair value of acquired properties:

- Appraisal value as of date the loan became an acquired property
- Broker Price Opinion (BPO) as of date the loan became acquired property
- Automated Valuation Model (AVM) as of the date the loan became an acquired property
- Appraisal/BPO of comparable property (e.g., similar zip code, square footage, construction year, etc.)
- AVM of comparable property (e.g. similar zip code, square footage, construction year, etc.)
- Internally developed model to approximate fair value less cost to sell for each property as of the date the loan became acquired property
- Other indications of value

Third party valuations will occasionally be adjusted for various factors including changing market conditions.

Ginnie Mae expenses all post-foreclosure costs as incurred in mortgage-backed securities program and other expenses included in gross cost in the Statements of Net Cost. Upon disposition of an acquired property, Ginnie Mae recognizes any gain or losses through "Gains on Disposition of Assets – Other" in earned revenues in the Statements of Net Cost.

Activity for acquired properties is presented in the table below:

Table 8B1. Activity for Acquired Properties:

Note 8: Other Non-Credit Reform Loans
For The Year Ended September 30, 2019
(Dollars in Millions)

		YTD as of September 2019
Beginning balance - Acquired Properties	$	25
Additions		23
Dispositions		(37)
Ending Balance - Acquired Properties	**$**	**11**
Beginning Balance - Valuation Allowance	$	(4)
Change in Valuation Allowance		3
Ending Balance - Valuation Allowance	**$**	**(1)**
Ending Balance - Acquired Properties, Net	**$**	**10**

Note 9: General Property, Plant, and Equipment (PP&E), Net

PP&E consists of furniture, fixtures, equipment, and data processing software used in providing goods and services that have an estimated useful life of two or more years. Purchases of $500,000 (PP&E) and $750,000 Internal Use Software (IUS) or more are recorded as an asset and depreciated over their estimated useful life on a straight-line basis with no salvage value for general property, plant and equipment. Generally, the Department's assets are depreciated over a three-year period for PP&E and IUS, unless it can be demonstrated that the estimated useful life is significantly greater than the specified time period.

The Department purchases and maintains all property, plant and equipment used by FHA, along with other Office of Housing activities.

Ginnie Mae's purchases of $100,000 or more for PP&E and IUS are recorded as an asset. Ginnie Mae depreciates its PP&E and IUS using the straight-line basis over a three to five-year period beginning when the assets are placed in use, unless another systematic and rational basis is more representative of the assets use.

The following shows general property, plant, and equipment as of September 30, 2019:

Note 9: General Property, Plant, and Equipment (PP&E), Net
For The Year Ended September 30, 2019
(Dollars in Millions)

	Cost	Accumulated Depreciation and Amortization	Book Value
Equipment	$ 5	$ (3)	$ 2
Equipment - Ginnie Mae	2	(1)	1
Leasehold Improvements	2	-	2
Leasehold Improvements - Ginnie Mae	-	-	-
Internal Use Software	-	-	-
Internal Use Software - Ginnie Mae	210	(159)	51
Internal Use Software in Development	-	-	-
Internal Use Software in Development - Ginnie Mae	29	-	29
Capital Leases - Ginnie Mae	1	(1)	-
Total	**$ 249**	**$ (164)**	**$ 85**

Additional Disclosure for Internal Use Software Implementation of *SFFAS No. 50*

The Department of Housing and Urban Development (HUD) utilized the prospective capitalization method and wrote off all Internal Use Software (IUS) and IUS in Development balances as permitted by *SFFAS No. 50*, Establishing Opening Balances for General Property, Plant, and Equipment in FY 2019. HUD wrote off an IUS balance of $7.1 million and a balance of $333 million for IUS in Development to establish an opening balance for IUS and IUS in Development in FY 2020. In accordance with *SFFAS No. 50*, HUD is making an unreserved assertion that its IUS line item is presented fairly in accordance with GAAP and discloses this change.

Note 10: PIH Prepayments and Advances

HUD's assets include the Department's estimates for Restricted Net Position (RNP) balances maintained by PHA under the HCV Program. The voucher program is the Federal Government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe and sanitary housing in the private market. RNP balances represent disbursements to PHAs that are in excess of their expenses. PHAs can use RNP balances to cover any valid Housing Assistance Program (HAP) expenses.

In FY 2018, OCFO and PIH developed and implemented an estimation methodology to calculate the prepayment balance. PHA's have 45 calendar days after the end of the month to report their expenses, which creates delays in utilizing actuals for the prepayment balance calculation. Therefore, the OCFO and PIH estimates the second and third month of a quarter's VMS expense data and the third month of the quarter's general ledger (GL) disbursement data. The estimation methodology uses the beginning balance of the RNP report, PHA's cash funding amount from the trial balance, PHA's expenses from the Voucher Management System (VMS) Data Report and adjusted for expenses greater than funding received. The estimation calculation is completed on a quarterly basis.

Since the 2nd quarter of FY 2019, the quarterly estimation has been significantly larger than the prior periods. The government shutdown contributed to the fluctuation of this estimate. Upon the government's reopening, there was a significant push to get the maximum amount of funding out to HUD's programs.

PIH has estimated RNP balances of $411 million for the 4th quarter FY 2019, consisting of $391 million for the HCV Program and $20 million for the Moving to Work Program.

PIH Advances - IHBG Programs

HUD's assets also include the Department's advance estimates for the PIH, Office of Native American Programs (ONAP), IHBG program. The ONAP program administers housing and community development programs that benefit American Indian and Alaska Native tribal governments, tribal members, the Department of Hawaiian Homelands, Native Hawaiians, and other Native American organizations. Its overall mission is to increase the supply of safe, decent, and affordable housing available to Native American families. The recipients of this program can either be an individual or may designate a Tribally Designated Housing Entity (TDHE) to draw down, invest, and/or expend funds on their behalf. If recipients are eligible through programmatic requirements to invest IHBG funding, then PIH will grant them authority. Those recipients that are not eligible to invest will draw their funds on a reimbursable basis.

In FY 2019, OCFO and PIH developed and implemented an estimation methodology to calculate advances on the portion that is invested by eligible recipients. The estimation is determined by multiplying the investment ratio by the current year's grant allocation amount for the recipients that meet the investment criteria. There are currently sixty-six recipients that have PIH authority to invest. The investment ratio is determined by adding the investment recipients September 30, 2019 balances for the last three fiscal years divided by the grant allocations made available to them during the same three previous fiscal years.

Due to the following constraints: 1) recipients have different fiscal year ends, 2) recipient financial report (SF425) do not report investment and expense amounts at the micro-level, i.e. individual grant and fiscal year, and 3) late funding availability causes investment portfolio fluctuations throughout the year. The advance estimation will be completed annually.

PIH's IHBG has estimated advance balances of $218 million for the 4th quarter of FY 2019.

Note 11: Other Assets

The following table shows HUD's Other Assets:

Note 11: Other Assets
For The Year Ended September 30, 2019
(Dollars in Millions)

	FHA	Ginnie Mae	Section 8	All Other	Total
Intragovernmental Assets:					
Advances and Prepayments	$ -	$ -	$ 1	$ 32	$ 33
Total Intragovernmental Assets	**$ -**	**$ -**	**$ 1**	**$ 32**	**$ 33**
Public:					
Advances and Prepayments	$ -	$ -	$ -	$ -	$ -
Total	**$ -**	**$ -**	**$ 1**	**$ 32**	**$ 33**

The Department's Intragovernmental Other Assets primarily represent Policy, Development, and Research (PD&R) programs with other federal agencies.

Note 12: Liabilities Not Covered by Budgetary Resources

The following table shows HUD's Liabilities Not Covered:

Note 12: Liabilities Not Covered by Budgetary Resources For The Year Ended September 30, 2019 (Dollars in Millions)		
Intragovernmental		
Accounts Payable	$	-
Other Intragovernmental Liabilities		22
Total Intragovernmental Liabilities	**$**	**22**
Public		
Federal Employee and Veteran Benefits	$	60
Other Liabilities		1,072
Total Public Liabilities	**$**	**1,132**
Total Liabilities Not Covered by Budgetary Resources	**$**	**1,154**
Total Liabilities Covered by Budgetary Resources	**$**	**38,376**
Total Liabilities Not Requiring Budgetary Resources	**$**	**3,527**
Total Liabilities	**$**	**43,057**

The Department's Intragovernmental liabilities not covered by budgetary resources principally consist of unfunded FECA liabilities. The Department's public liabilities not covered by budgetary resources principally consist of Ginnie Mae's Liability for Loss on Remaining Coverage and the Department's unfunded payroll and benefits costs such as unfunded leave, unfunded FECA liability, and actuarial FECA liability.

This note also includes the category "Total Liabilities Not Requiring Budgetary Resources" which consist of FHA's receipt account liabilities and HUD's deposit, clearing and general fund receipt account liabilities.

Note 13: Debt

Several HUD programs have the authority to borrow funds from Treasury for program operations. Additionally, the *National Housing Act* authorizes FHA, in certain cases, to issue debentures in lieu of cash to pay claims. Also, PHAs and TDHEs borrowed funds from the private sector and the FFB to finance construction and rehabilitation of low-rent housing. HUD is repaying these borrowings on behalf of the PHAs and TDHEs.

The following table shows HUD borrowings, and borrowings by PHAs/TDHEs for which HUD is responsible for repayment:

Note 13: Debt
For The Year Ended September 30, 2019
(Dollars in Millions)

	Beginning Balance	Net Borrowings	Ending Balance
Debt to the Federal Financing Bank	$ 1,671	$ 304	$ 1,975
Debt to the U.S. Treasury	24,842	5,567	30,409
Held by the Public	3	(1)	2
Total	**$ 26,516**	**$ 5,870**	**$ 32,386**

Classification of Debt:	
Intragovernmental Debt	$ 32,384
Debt Held by the Public	2
Total	**$ 32,386**

Interest paid on borrowings for FHA and HUD Proper as of September 30, 2019 was $1,220 million and $4 million respectively. The purpose of the borrowing is discussed in the following paragraphs.

Borrowings from Treasury

FHA borrows from the Bureau of the Fiscal Service's (BFS) Federal Investments and Borrowings Branch, which facilitates loans to federal agencies on behalf of the Department of the Treasury. The FCRA permits agencies to borrow from Treasury to support credit programs. Collections and disbursements with the public are transacted in FHA's financing accounts and are considered a means-of-financing (non-budgetary). When cash balances are insufficient to support its operations, FHA borrows from Treasury. When there is sufficient cash in the financing accounts, FHA can opt to repay principal. Repayments of principal can be made throughout the fiscal year.

Both interest revenue and expense are accrued at FHA's Single Effective Rate (SER). FHA's single effective rates range from 1.02 percent to 7.59 percent. Interest revenue is based on the cash balances in the financing accounts, whereas interest expense is based on the principal balances for the entire fiscal year (effective date of October 1st of the current fiscal year), regardless of the actual transaction date.

HUD's Other Programs with outstanding aggregate borrowings are the Indian Housing Loan Guarantee Program, the Native Hawaiian Housing Block Grant Program, the Emergency Homeowner's Loan Program, and the Green Retrofit Program. These borrowings have interest rates ranging from 1.67 percent to 7.23 percent.

Borrowings from the Federal Financing Bank and the Public

During the 1960s to 1980s, PHAs obtained loans from the private sector and from the FFB to finance development and rehabilitation of low rent housing projects. HUD is repaying these borrowings on behalf of the PHAs, through the Low Rent Public Housing Program. For borrowings from the public, interest is payable throughout the year. All FFB borrowings had been repaid.

FHA began an FFB Risk Share program in FY 2015 an inter-agency partnership between HUD, FFB, and the HFAs. The FFB Risk Share Program provides funding for multifamily mortgage loans insured by FHA. Under this program, FHA records a direct loan from the public and borrowing from FFB. The program does not change the basic structure of Risk Sharing; it only substitutes FFB as the funding source. The HFAs would originate and service the loans and share in any losses.

Note 14: Federal Employee and Veterans' Benefits

HUD accrues the portion of the estimated liability for disability benefits assigned to the agency under the *Federal Employee Compensation Act* (FECA), administered and determined by the DOL. The liability, based on the net present value of estimated future payments based on a study conducted by DOL, was $60 million as of September 30, 2019. Future payments on this liability are to be funded by future financing sources.

Note 15: Other Liabilities

The following table shows HUD's Other Liabilities:

Note 15: Other Liabilities For The Year Ended September 30, 2019 (Dollars in Millions)	Non Current	Current	Total
Intragovernmental Liabilities			
FHA Special Receipt Account Liability	$ -	$ 3,219	$ 3,219
Unfunded FECA Liability	13	-	13
Employer Contributions and Payroll Taxes Payable	-	10	10
Miscellaneous Receipts Payable to Treasury	-	278	278
Advances to Federal Agencies	-	8	8
Intragovernmental Other Liabilities	**$ 13**	**$ 3,515**	**$ 3,528**
Other Liabilities			
FHA Other Liabilities	$ -	$ 463	$ 463
FHA Escrow Funds Related to Mortgage Notes Current	-	304	304
Ginnie Mae Deferred Income	419	14	433
Deferred Credits	38	13	51
Deposit Funds	5	16	21
Accrued Unfunded Annual Leave	82	-	82
Accrued Funded Payroll Benefits	-	36	36
Contingent Liability	18	-	18
Ginnie Mae Liability for Loss on Remaining Coverage	965	7	972
Other	5	4	9
Total	**$ 1,545**	**$ 4,372**	**$ 5,917**

Special Receipt Account Liability

The special receipt account liability is created from negative subsidy re-estimates and downward credit subsidy in the GI/SRI special receipt account.

Other Liabilities

As of September 30, 2019, FHA's Other Liabilities consisted of liabilities for premiums collected on unendorsed cases of $380 million and miscellaneous liabilities of $83 million, which include disbursements in transit and unearned premium revenue. In addition, FHA had liabilities for escrow funds related to mortgage notes totaling $304 million. Premiums collected for unendorsed cases represent liabilities associated with premiums collected for cases that have yet to be endorsed.

Other liabilities current consists mostly of suspense funds, receipt accruals, and payroll-related costs, as well as the current portions of Ginnie Mae deferred income and Liability for Loss on Remaining Coverage. See Note (25) Insurance Programs for additional information on Ginnie Mae's Liability for Loss on Remaining Coverage. Other liabilities non-current includes deferred income for Ginnie Mae fees, and the non-current portion of Ginnie Mae's Liability for Loss on Remaining Coverage. Current portions of liabilities are determined based on amounts projected to be realized in the following 12 months. The account balances are separately maintained at the general ledger account level between current and non-current portions and adjusted based on the underlying support and schedules for the balances maintained by Ginnie Mae. The classification of deferred income depends on the reason the revenue has not yet been recognized. Amounts received from a customer that are expected to be recognized as revenue upon completion of performance obligations are classified as deferred revenue prior to recognition as income. This includes commitment and multiclass fees received as issuers request commitment authority or issue multiclass products, respectively. Amounts are recognized into income over a period of time or at a point in time depending on when performance obligation is fulfilled. Cash collected that would have to be returned is classified as deferred liability. This includes unapplied deposits and cash received but transferred back to MSS for pass through to investors.

Note 16: Contingencies

Lawsuits and Other

HUD is party to several claims and tort actions related to pending or threatened litigation brought against it concerning the implementation or operation of its various programs. The Department recorded a contingent liability in its financial statements as of September 30, 2019 based on the cases listed below as "probable." HUD is also party to various other cases currently listed below as "reasonably possible:"

Note 16: Contingencies
For The Year Ended September 30, 2019
(Dollars in Millions)

	Number of Cases	Accrued Liabilities	Range of Loss - Lower	Range of Loss - Upper
Legal Contingencies:				
Probable	2	$ 18	$ -	$ 18
Reasonable Possible	6	-	-	152
Other Contingencies:				
Probable		$ -	$ -	$ -
Reasonable Possible		-	-	-

Of the six cases listed as reasonably possible, two of the cases have an unknown estimated amount or range of potential losses. All other case ranges have been disclosed in the table above. Other ongoing suits cannot be reasonably determined at this time, and in the opinion of management and general counsel, the ultimate resolution of the other pending litigation will not have a material effect on the Department's financial statements. The general counsel has reviewed FHA's and Ginnie Mae's claims for FY 2019 and determined that as of September 30, 2019, the ultimate resolution of legal actions would not affect HUD's consolidated financial statements. As a result, no contingent liability has been recorded for FHA and Ginnie Mae. In addition, there are no asserted or unasserted claims, or assessments in which Ginnie Mae's potential loss exceeds is $0.5 million individually, or in the aggregate for similar cases for which the amount of the potential loss exceeds $1.0 million in the aggregate for cases not listed individually or as part of similar cases that could be material to the financial statements as of September 30, 2019.

Note 17: Funds from Dedicated Collections

SFFAS No. 27: Identifying and Reporting Earmarked Funds, as amended by *SFFAS No. 43: Funds from Dedicated Collections: Amending Statement of Federal Financial Accounting Standards 27,* defines the following three criteria for determining a fund from dedicated collections: 1) a statute committing the Federal Government to use specifically identified revenue and/or other financing sources that are originally provided to the Federal Government by a non-federal source only for designated activities, benefits, or purposes; 2) explicit authority for the fund to retain revenue and/or other financing sources not used in the current period for future use to finance the designated activities, benefits, or purposes; and 3) a requirement to account for and report on the receipt, use, and retention of the revenue and/or other financing sources that distinguished the fund from the Federal Government's general revenue.

A fund from dedicated collection may contain non-federal sources of revenue and other financing sources that are material to the reporting entity provided it meets the criteria reported above. Each of HUD's programs are considered non-governmental inflow. Intradepartmental activity reported in a fund from dedicated collection is often offset with activity in other funds. Accordingly, the Department presents information for funds from dedicated collections and all other funds in the BS and SCNP on a combined basis. The elimination of intradepartmental activity between dedicated collections and all other funds is presented in the SCNP.

Ginnie Mae

Title III of the *National Housing Act* created Ginnie Mae as a government corporation to guarantee the timely payment of principal and interest on MBS certificates or other approved securities. Ginnie Mae is authorized under the *Act* to fund its program's operations through various off-setting collections, such as guaranty, commitment, multiclass, new issuer, civil penalty, servicing, and pool transfer fees. These collections are dedicated for Ginnie Mae use to administer its MBS guaranty program. In the event the issuer is unable to make any payment of principal or interest on any security guaranteed, Ginnie Mae shall make such payments as and when due in cash, and thereupon shall be subrogated fully to the rights satisfied by such payment. See Note (25) Insurance Programs for additional information.

Rental Assistance Demonstration (RAD) Conversion Program

The *United States Housing Act of 1937* (*42 U.S.C. 1437g*) where the section 9 assistance is insufficient to support conversion of the property under the demonstration, in accordance with procedures established by the Secretary.

The RAD conversion program was created in order to give PHAs a powerful tool to preserve and improve public housing properties and address a nationwide backlog of deferred maintenance. RAD also gives program owners the opportunity to enter into long-term contracts that facilitate the financing of improvements. The RAD programs that were designated as funds from dedicated collections were Tenant Based and Project Based programs. The Rental Assistance Demonstration (RAD) conversion funds under the Section 8 program were incorrectly classified as Funds from Dedicated Collections instead of All Other Funds. See Note (1) Summary of Significant Accounting Policies under the “Correction of Errors” section for more information.

Rental Housing Assistance Fund

The *Housing and Urban Development Act of 1968* authorized the Secretary to establish a revolving fund into which rental collections in excess of the established basic rents for units in Section 236 subsidized projects would be deposited. The *Housing and Community Development Amendment* of 1978 authorized the Secretary, subject to approval in appropriation acts, to transfer excess rent collections received after 1978 to the Troubled Projects Operating Subsidy Program, renamed the Flexible Subsidy Fund. Prior to that time, collections were used for paying tax and utility increases in Section 236 projects. The *Housing and Community Development Act* amended in 1980 authorized the transfer of excess rent collections regardless of when collected.

Flexible Subsidy

As authorized by *12 U.S. Code 1715z-1*, the Flexible Subsidy Fund provides federal assistance for troubled multifamily housing projects which includes supporting capital improvements to maintain these low to moderate income projects. The subsidies are intended to prevent potential losses to the FHA fund resulting from project insolvency, and to preserve these projects as a viable source of housing for low and moderate-income tenants.

Manufactured Housing Fees Trust Fund

The *National Manufactured Housing Construction and Safety Standards Act of 1974*, as amended by the *Manufactured Housing Improvement Act of 2000*, authorizes development and enforcement of appropriate standards for the construction, design, and performance of manufactured homes to assure their quality, durability, affordability, and safety.

Fees are charged to the manufacturers for each manufactured home transportable section produced and will be used to fund the costs of all authorized activities necessary for the consensus committee (HUD) and its agents to carry out all aspects of the manufactured housing legislation. The fee receipts are permanently appropriated and have helped finance a portion of the direct administrative expenses incurred in program operations. Activities are initially financed via transfer from the Manufactured Housing General Fund.

American Recovery and Reinvestment Act Programs (*Recovery Act*)

The *Recovery Act* included 17 programs at HUD which were distributed across three themes that align with the broader Recovery goals. A further discussion of HUD's accomplishments for the *Recovery Act* program can be found on the HUD website, specifically on the Recovery page. Previously, all programs were categorized as Funds from Dedicated Collections. In FY 2017, two programs (*Working Capital Fund Recovery Act* and the Green Retrofit financing account) were changed to Other Funds based on exclusions noted in *SFFAS No. 27: Identifying and Reporting Dedicated Collections.* In the 4th quarter of FY 2019, the Green Retrofit program account had a downward technical re-estimate processed based on regulatory requirements in the OMB *Circular A-11.*

Other

The “Other” column has an immaterial amount in its Fund Balance with Treasury.

Note 17: Funds from Dedicated Collections
For The Year Ended 2019
(Dollars in Millions)

	Ginnie Mae	Tenant Based Rental Assistance	Project Based Rental Assistance	Rental Housing Assistance	Flexible Subsidy	Manufactured Housing Fees Trust Fund	Recovery Act Funds	Other	Total Dedicated Collections (Combined)
Balance Sheet									
Fund Balance with Treasury	$ 7,897	$ -	$ -	$ 15	$ 561	$ 28	$ -	$ -	$ 8,501
Cash and Other Monetary Assets	39	-	-	-	-	-	-	-	39
Investments	15,784	-	-	-	-	-	-	-	15,784
Accounts Receivable	167	-	-	-	-	-	-	-	167
Loans Receivable	-	-	-	-	319	-	-	-	319
Other Non-Credit Reform Loans Receivable	2,526	-	-	-	-	-	-	-	2,526
General Property, Plant and Equipment	81	-	-	-	-	-	-	-	81
Total Assets	**$ 26,494**	**$ -**	**$ -**	**$ 15**	**$ 880**	**$ 28**	**$ -**	**$ -**	**$ 27,417**
Debt - Intragovernmental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Accounts Payable - Intragovernmental	50	-	-	-	-	-	-	-	50
Accounts Payable - Public	39	-	-	-	-	4	-	-	43
Other Liabilities - Public	1,465	-	-	-	-	-	-	-	1,465
Total Liabilities	**$ 1,554**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 4**	**$ -**	**$ -**	**$ 1,558**
Unexpended Appropriations	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Results of Operations	24,940	-	-	15	880	24	-	-	25,859
Total Net Position	**$ 24,940**	**$ -**	**$ -**	**$ 15**	**$ 880**	**$ 24**	**$ -**	**$ -**	**$ 25,859**
Total Liabilities and Net Position	**$ 26,494**	**$ -**	**$ -**	**$ 15**	**$ 880**	**$ 28**	**$ -**	**$ -**	**$ 27,417**
Statement of Net Cost for the Period Ended									
Gross Costs	$ 1,261	$ -	$ -	$ 1	$ (2)	$ 11	$ (3)	$ -	$ 1,268
Less Earned Revenues	(1,946)	-	-	-	(2)	(14)	-	-	(1,962)
Net Costs	**$ (685)**	**$ -**	**$ -**	**$ 1**	**$ (4)**	**$ (3)**	**$ (3)**	**$ -**	**$ (694)**
Statement of Changes in Net Position for the Period Ended									
Net Position Beginning of Period	$ 24,284	$ 38	$ 30	$ 16	$ 874	$ 21	$ -	$ -	$ 25,263
Changes in Accounting Principles	50	-	-	-	-	-	-	-	50
Correction of Errors	(81)	(38)	(30)	(1)	-	-	-	-	(150)
Net Position Beginning of Period, as Adjusted	**$ 24,253**	**$ -**	**$ -**	**$ 15**	**$ 874**	**$ 21**	**$ -**	**$ -**	**$ 25,163**
Imputed Costs	$ 2	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 2
Nonexchange Revenue	-	-	-	1	2	-	-	-	3
Other Adjustments	-	-	-	-	-	-	(3)	-	(3)
Net Costs	**$ 685**	**$ -**	**$ -**	**$ (1)**	**$ 4**	**$ 3**	**$ 3**	**$ -**	**$ 694**
Change in Net Position	**$ 687**	**$ -**	**$ -**	**$ -**	**$ 6**	**$ 3**	**$ -**	**$ -**	**$ 696**
Net Position End of Period	**$ 24,940**	**$ -**	**$ -**	**$ 15**	**$ 880**	**$ 24**	**$ -**	**$ -**	**$ 25,859**

Note 18: Legal Arrangements Affecting the Use of Unobligated Balances

Pursuant to Title III of the *National Housing Act*, Ginnie Mae collections from Commitment and Multiclass fees are credited to offsetting collections in the Program Account. The portion of Commitment and Multiclass fees collection in excess of the enacted amounts available of annual and/or no-year S&E spending are precluded from being available for obligation.

The following table presents the precluded funds from obligation activities and balances:

Note 18: Legal Arrangements Affecting the Use of Unobligated Balances For The Year Ended September 30, 2019 (Dollars in Millions)		
Precluded Obligations Balance, Beginning	$	734
Collections		110
Precluded Obligations Balance, Ending	**$**	**844**

Note 19: Net Costs of HUD's Cross-Cutting Programs

This note provides a categorization of net costs for several major program areas whose costs were incurred among HUD's principal organizations previously discussed under Section 1 of the report. Costs incurred under HUD's other programs represent activities which support the Department's strategic goal to develop and preserve quality, healthy, and affordable homes. The following table shows the cross-cutting of HUD's major program areas that incur costs that cross multiple program areas:

Note 19: Net Costs of HUD's Cross-Cutting Programs
For The Year Ended 2019
(Dollars in Millions)

HUD's Cross-Cutting Programs	Public & Indian Housing	Housing	Community Planning & Development	Other	Consolidated
Section 8 Rental Assistance					
Intragovernmental Gross Costs	$ 83	$ 48	$ -	$ -	$ 131
Intragovernmental Earned Revenues	-	-	-	-	-
Intragovernmental Net Costs	**$ 83**	**$ 48**	**$ -**	**$ -**	**$ 131**
Gross Costs with the Public	$ 22,374	$ 12,232	$ 76	$ -	$ 34,682
Earned Revenues	-	-	-	-	-
Net Costs with the Public	**$ 22,374**	**$ 12,232**	**$ 76**	**$ -**	**$ 34,682**
Net Program Costs	**$ 22,457**	**$ 12,280**	**$ 76**	**$ -**	**$ 34,813**
Public and Indian Housing Loans and Grants (PIH)					
Intragovernmental Gross Costs	$ 17	$ -	$ -	$ -	$ 17
Intragovernmental Earned Revenues	-	-	-	-	-
Intragovernmental Net Costs	**$ 17**	**$ -**	**$ -**	**$ -**	**$ 17**
Gross Costs with the Public	$ 2,839	$ -	$ -	$ -	$ 2,839
Earned Revenues	-	-	-	-	-
Net Costs with the Public	**$ 2,839**	**$ -**	**$ -**	**$ -**	**$ 2,839**
Net Program Costs	**$ 2,856**	**$ -**	**$ -**	**$ -**	**$ 2,856**
Homeless Assistance Grants					
Intragovernmental Gross Costs	$ -	$ -	$ 16	$ -	$ 16
Intragovernmental Earned Revenues	-	-	(3)	-	(3)
Intragovernmental Net Costs	**$ -**	**$ -**	**$ 13**	**$ -**	**$ 13**
Gross Costs with the Public	$ -	$ -	$ 2,131	$ -	$ 2,131
Earned Revenues	$ -	$ -	$ -	$ -	$ -
Net Costs with the Public	**$ -**	**$ -**	**$ 2,131**	**$ -**	**$ 2,131**
Net Program Costs	**$ -**	**$ -**	**$ 2,144**	**$ -**	**$ 2,144**
Housing for the Elderly and Disabled					
Intragovernmental Gross Costs	$ -	$ 4	$ -	$ -	$ 4
Intragovernmental Earned Revenues	-	-	-	-	-
Intragovernmental Net Costs	**$ -**	**$ 4**	**$ -**	**$ -**	**$ 4**
Gross Costs with the Public	$ -	$ 936	$ -	$ 2	$ 938
Earned Revenues	-	(1)	-	(61)	(62)
Net Costs with the Public	**$ -**	**$ 935**	**$ -**	**$ (59)**	**$ 876**
Net Program Costs	**$ -**	**$ 939**	**$ -**	**$ (59)**	**$ 880**
Community Development Block Grants (CDBG)					
Intragovernmental Gross Costs	$ -	$ -	$ 40	$ -	$ 40
Intragovernmental Earned Revenues	-	-	-	-	-
Intragovernmental Net Costs	**$ -**	**$ -**	**$ 40**	**$ -**	**$ 40**
Gross Costs with the Public	$ 57	$ -	$ 4,991	$ -	$ 5,048
Earned Revenues	-	-	-	-	-
Net Costs with the Public	**$ 57**	**$ -**	**$ 4,991**	**$ -**	**$ 5,048**
Net Program Costs	**$ 57**	**$ -**	**$ 5,031**	**$ -**	**$ 5,088**
HOME					
Intragovernmental Gross Cost	$ -	$ -	$ 7	$ -	$ 7
Intragovernmental Earned Revenues	-	-	-	-	-
Intragovernmental Net Costs	**$ -**	**$ -**	**$ 7**	**$ -**	**$ 7**
Gross Costs with the Public	$ -	$ -	$ 954	$ -	$ 954
Earned Revenues	-	-	-	-	-
Net Costs with the Public	**$ -**	**$ -**	**$ 954**	**$ -**	**$ 954**
Net Program Costs	**$ -**	**$ -**	**$ 961**	**$ -**	**$ 961**
Other					
Intragovernmnetal Gross Costs	$ 82	$ 28	$ 31	$ 85	$ 226
Intragovernmental Earned Revenue	(7)	-	(1)	(4)	(12)
Intragovernmental Net Costs	**$ 75**	**$ 28**	**$ 30**	**$ 81**	**$ 214**
Gross Costs with the Public	$ 4,757	$ 216	$ 621	$ (128)	$ 5,466
Earned Revenues	-	(17)	-	-	(17)
Net Costs with the Public	**$ 4,757**	**$ 199**	**$ 621**	**$ (128)**	**$ 5,449**
Net Program Costs	**$ 4,832**	**$ 227**	**$ 651**	**$ (47)**	**$ 5,663**
Costs Not Assigned To Programs	**$ 103**	**$ 50**	**$ 59**	**$ -**	**$ 212**
Net Program Costs (Including indirect costs)	**$ 4,935**	**$ 277**	**$ 710**	**$ (47)**	**$ 5,875**
Eliminations					
Intragovernmental Gross Costs	$ -	$ -	$ -	$ -	$ -
Intragovernmental Earned Revenue	-	-	-	-	-
Intragovernmental Net Costs	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**

Note 20: Undelivered Orders and Commitments under HUD's Grant, Subsidy, and Loan Programs

Contractual Commitments

HUD has entered into extensive long-term obligations that consist of legally binding agreements to provide grants, subsidies, or loans. Obligations become liabilities when all actions required for payment under an agreement have occurred. The mechanism for funding subsidy obligations generally differs depending on whether the agreements were entered into before or after 1988.

With the exception of the Housing for the Elderly and Disabled and Low Rent Public Housing Loan Programs (which have been converted to grant programs), Section 235/236 Programs, and a portion of "All Other" programs, HUD management expects all of the programs to continue incurring new obligations under authority granted by Congress in future years. However, estimated future obligations under such new authority are not included in the amounts below.

Prior to fiscal year 1988, HUD's subsidy programs, primarily the Section 8 Program and Section 235/236 Programs, operated under contract authority. Each year, Congress provided HUD the authority to enter into multiyear contracts within annual and total contract limitation ceilings. HUD then drew on permanent indefinite appropriations to fund the current year's portion of those multiyear contracts. Because of the duration of these contracts (up to 40 years), significant authority existed to draw on the permanent indefinite appropriations. Beginning in FY 1988, the Section 8 and Section 235/236 Programs began operating under multiyear budget authority whereby the Congress appropriates the funds "up-front" for the entire contract term in the initial year.

HUD's balances are based on the amount of unliquidated obligations recorded in HUD's accounting records with no provision for changes in future eligibility, and thus are equal to the maximum amounts available under existing agreements and contracts. Unexpended appropriations and cumulative results of operations shown in the Consolidated Balance Sheet is comprise funds with Treasury which are available to fund existing obligations that were provided through "up-front" appropriations, and also include permanent, indefinite appropriations received in excess of amounts used to fund the pre-1988 subsidy contracts and offsetting collections.

FHA enters into long-term contracts for both program and administrative services. FHA funds these contractual obligations through unexpended appropriations, permanent, indefinite authority, and offsetting collections. The appropriated funds are primarily used to support administrative contract expenses while the permanent indefinite authority and the offsetting collections are used for program services. The permanent indefinite authority for FHA as of September 30, 2019, was $78 million. The offsetting collections for FHA's undelivered orders as of September 30, 2019 were $2,907 million. The offsetting collection for Ginnie Mae's undelivered orders as of September 30, 2019 was $1,531 million.

The following table shows HUD's unpaid obligations and contractual commitments under its grant, subsidy, and loan programs:

Note 20: Undelivered Orders and Commitments under HUD's Grant, Subsidy, and Loan Programs For The Year Ended September 30, 2019 (Dollars in Millions)			
	Federal	Non-Federal	Total
Federal Housing Administration (FHA)	$ 5	$ 3,098	$ 3,103
Government National Mortgage Association (GNMA)	141	1,390	1,531
Section 8 Rental Assistance	-	8,283	8,283
Public and Indian Housing Loans and Grants (PIH)	-	5,601	5,601
Homeless Assistance Grants	-	2,845	2,845
Housing for the Elderly and Disabled	3	1,109	1,112
Community Development Block Grants (CDBG)	-	21,766	21,766
HOME	-	3,429	3,429
Section 235 & 236 Other	-	339	339
All Other	194	4,120	4,314
Total	**$ 343**	**$ 51,980**	**$ 52,323**

The following table shows HUD's paid obligations and contractual commitments under its grant, subsidy, and loan programs:

Note 20: Undelivered Orders and Commitments under HUD's Grant, Subsidy, and Loan Programs For The Year Ended September 30, 2019 (Dollars in Millions)			
	Federal	Non-Federal	Total
Federal Housing Administration (FHA)	$ -	$ -	$ -
Government National Mortgage Association (GNMA)	-	-	-
Section 8 Rental Assistance	1	411	412
Public and Indian Housing Loans and Grants (PIH)	-	218	218
Homeless Assistance Grants	-	-	-
Housing for the Elderly and Disabled	-	-	-
Community Development Block Grants (CDBG)	-	-	-
HOME	-	-	-
Section 235 & 236 Other	-	-	-
All Other	33	-	33
Total	**$ 34**	**$ 629**	**$ 663**

Administrative Commitments

In addition to the above contractual commitments, HUD has entered into administrative commitments which are the reservation of funds for specific projects (including those for which a contract has not yet been executed) to obligate all or part of those funds. Administrative commitments become contractual commitments upon contract execution.

The following table shows HUD's administrative commitments:

Note 20: Undelivered Orders and Commitments under HUD's Grant, Subsidy, and Loan Programs For The Year Ended September 30, 2019 (Dollars in Millions)		
Federal Housing Administration (FHA)	$	-
Government National Mortgage Association (GNMA)		-
Section 8 Rental Assistance		90
Public and Indian Housing Loans and Grants (PIH)		4
Homeless Assistance Grants		101
Housing for the Elderly and Disabled		104
Community Development Block Grants (CDBG)		27,324
HOME		231
Section 235 & 236 Other		-
All Other		167
Total	**$**	**28,021**

Note 21: Apportionment Categories of Obligations Incurred

Budgetary resources are usually distributed in an account or fund by specific time periods, activities, projects, objects, or a combination of these categories. Resources apportioned by fiscal quarters are classified as Category A apportionments. Apportionments by any other category would be classified as Category B apportionments.

HUD's categories of obligations incurred:

Note 21: Apportionment Categories of Obligations Incurred For The Year Ended September 30, 2019 (Dollars in Millions)						
		Category A		**Category B**		**Total**
Direct	$	931	$	106,304	$	107,235
Reimbursable		-		6,212		6,212
Total	**$**	**931**	**$**	**112,516**	**$**	**113,447**

Note 22: Explanation of Differences between the Statement of Budgetary Resources and the Budget of the United States Government

The President's Budget containing actual FY 2019 data is not available for comparison to the SBR. Actual FY 2019 data will be available at a later date at https://www.whitehouse.gov/omb/budget/. For FY 2018, an analysis to compare HUD's SBR to the President's Budget of the U.S. was performed to identify any differences. The following shows the difference between Budgetary Resources to the President's Budget for FY 2018.

Note 22: Consolidated Statement of Budgetary Resources to President's Budget
For The Year Ended September 2019
(Dollars in Millions)

	Budgetary Resources	New Obligations and Upward Adjustments	Distributed Offsetting Receipts	Net Outlays
Combined Statement of Budgetary Resources	$ 221,625	$ 106,959	$ 1,548	$ 49,295
Resources related to HUD's expired accounts not reported in the President's Budget	(751)	(4)	-	-
Offsetting receipts not included in the President's Budget	(2)	-	(284)	-
Miscellaneous Differences	(5)	-	(1)	4
Increased collections	-	-	(4)	
Recoveries Prior Year Unpaid/paid Obligations	4	-	-	-
Budget of the U.S. Government	**$ 220,871**	**$ 106,955**	**$ 1,259**	**$ 49,299**

Note 23: Budget and Accrual Reconciliation

During FY 2018, FASAB issued *SFFAS No. 53: Budget and Accrual Reconciliation* which requires a reconciliation of HUD's net outlays on a budgetary basis to its net cost of operations during the reporting period. The reconciliation, called the Budget and Accrual Reconciliation replaces the Statement of Financing (SOF) net disclosure, which reconciled the budgetary resources obligated (and some non-budgetary resources) and the net cost of operations.

Budgetary and financial accounting information differ. Budgetary accounting is used for planning and control purposes and relates to both the receipt and use of cash, as well as reporting the federal deficit. Financial accounting is intended to provide a picture of the government's financial operations and financial position, so it presents information on an accrual basis. The accrual basis includes information about costs arising from the consumption of assets and the incurrence of liabilities. The reconciliation of net outlays presented on a budgetary basis, and the net cost presented on an accrual basis, provides an explanation of the relationship between budgetary and financial accounting information. The reconciliation serves not only to identify costs paid for in the past and those that will be paid in the future, but also to assure integrity between budgetary and financial accounting.

The unique nature of Ginnie Mae's business and accounting processes required to implement the Modified Credit Reform structure described in Note (1) Summary of Significant Accounting Policies requires that certain general ledger accounts are mapped differently than the suggested crosswalk published by Treasury. These differences are summarized below:

Components of Net Cost That Are Not Part of Net Outlays:

The Treasury crosswalk suggests mapping general ledger account "Interest Receivable – Investments" to the "Accounts Receivable" line. Ginnie Mae's includes the "Investments" line under "Increase (Decrease) in Assets." This is consistent with how Ginnie Mae presents its investments in the accompanying Balance Sheet and Note (5) Investments. The balance in this account pertains to interest receivable specifically attributable to Ginnie Mae investments.

Ginnie Mae's general ledger accounts for "Foreclosed Property" and "Foreclosed Property – Allowance" are included in the "Loans Receivable" line under "Increase (Decrease) in Assets", consistent with how Ginnie Mae presents its "Other Non-Credit Reform Loans" on the accompanying Balance Sheet.

The Treasury crosswalk does not include suggested mapping for Ginnie Mae's Other Non-Credit Reform Loans general ledger accounts. See Note (8) Other Non-Credit Reform Loan for additional information. The Treasury crosswalk suggests mapping general ledger account "Other Assets" to the "Other Assets" line. Ginnie Mae includes account "Other Assets" in the "Loans Receivable" line under "Increase (Decrease) in Assets", this is consistent with how Ginnie Mae presents its "Other Non-Credit Reform Loans" on the accompanying Balance Sheet. Ginnie Mae uses account "Other Assets "to record its Properties Held for Sale. For additional information see Note (8) Other Non-Credit Reform Loans.

The Treasury crosswalk suggests mapping general ledger accounts "Gains on Disposition of Assets – Other" to the "Property, Plant, and Equipment disposal & reevaluation" line. Ginnie Mae includes the impact of all costs not part of net outlays which are present in the general ledger account in the "Loans Receivable" line under "Increase (Decrease) in Assets", consistent with how Ginnie Mae presents its "Other Non-Credit Reform Loans" on the accompanying Balance Sheet. Ginnie Mae uses account "Gains on Disposition of Assets – Other" to record gains and losses on disposal or liquidation of its Other Non-Credit Reform Loan assets. For additional information see Note (8) Other Non-Credit Reform Loans and see Note (1) Significant Accounting Policies related to Other Non-Credit Reform Loans.

FHA's treatment of Credit Reform offsets to Receivables and Payables, "Deferred Debits" and "Deferred Credits" respectively have an impact on the presentation of the BAR. Deferred Debits, captured by FHA in USSGL account 199000 *Other Assets*, are contra-payables presented as liabilities, while Deferred Credits are captured by FHA in USSGL account 232000 *Other Deferred Revenue* are contra-receivables presented as assets. Although approved by the Bureau of Fiscal Service (BFS) for fiscal year

2019, the presentation is contrary to Treasury's financial statement crosswalk. FHA's treatment impacts the Accounts Receivable, Loans Receivable, Other Assets, Accounts Payable, and Other Liabilities lines of the BAR.

Components of Net Outlays that Are Not Part of Net Cost:

To determine the amount included in the "Acquisition of Capital Assets" line, Ginnie Mae computed the changes resulting from acquisition of assets in the proprietary property, plant and equipment accounts. This was necessary as the suggested Treasury crosswalk requires the use of the memorandum account which is not used by Ginnie Mae.

HUD's analysis below illustrates this reconciliation by listing the key differences between net cost and net outlays. The Budget and Accrual Reconciliation is as follows:

Note 23: Budget and Accrual Reconciliation
For The Year Ended September 30, 2019
(Dollars in Millions)

	Intragovernmental	With the Public	Total
Net Operating Cost	$ 115	$ 26,979	$ 27,094
Components of Net Operating Cost Not Part of the Budgetary Outlays			
Property, plant, and equipment depreciation	-	(22)	(22)
Property, plant, and equipment disposal & reevaluation	-	-	-
Unrealized valuation loss/(gain) on investment in GSE's	-	-	-
Year-end credit reform subsidy re-estimates	-	12,131	12,131
Other	1	-	1
Increase/(decrease) in assets:			
Accounts receivable	$ -	$ (135)	$ (135)
Loans receivable	-	4,554	4,554
Other assets	(13)	424	411
Investments	105	(2)	103
(Increase)/Decrease in Liabilities not affecting Budgetary Outlays:			
Accounts payable	$ (22)	$ 201	$ 179
Salaries and benefits	(1)	(4)	(5)
Insurance and guarantee program liabilities	-	3,922	3,922
Environmental and disposal liabilities	-	-	-
Other liabilities (Unfunded leave, unfunded FECA, actuarial FECA)	(383)	(963)	(1,346)
Other Financing Sources			
Federal employee retirement benefit costs paid by OPM and imputed to agency	$ (79)	$ -	$ (79)
Transfers out (in) without reimbursement	4	-	4
Other imputed finance	-	-	-
Total Components of Net Operating Cost Not Part of the Budgetary Outlays	**$ (388)**	**$ 20,106**	**$ 19,718**
Components of the Budgetary Outlays That Are Not Part of Net Operating Cost			
Effect of prior year agencies credit reform subsidy re-estimate	$ -	$ 5,344	$ 5,344
Acquisition of capital assets	-	17	17
Acquisition of inventory	-	-	-
Acquisition of other assets	-	-	-
Debt and equity securities	-	-	-
Other	3,007	(137)	2,870
Total Components of the Budgetary Outlays That Are Not Part of Net Operating Cost	**$ 3,007**	**$ 5,224**	**$ 8,231**
Other Temporary Timing Differences	$ (2,717)	$ (175)	$ (2,892)
Total Other Temporary Timing Differences	**$ (2,717)**	**$ (175)**	**$ (2,892)**
Net Outlays (Calculated Total)	**$ 17**	**$ 52,134**	**$ 52,151**
Related Amounts on the Statement of Budgetary Resources			
Outlays, Net (Total) (discretionary and mandatory) (SBR 4190)	$ -	$ -	$ 54,716
Distributed offsetting receipts (SBR 4200)	-	-	(2,565)
Outlays, Net (SBR 4210)	$ -	$ -	**$ 52,151**

Note 24: Public Private Partnerships (P3s)

Federal public-private partnerships (P3s) are risk-sharing arrangements or transactions with expected lives greater than five years between public and private sector entities. Such arrangements or transactions provide a service or an asset for government and/or general public use where in addition to the sharing of resources, each party shares in the risks and rewards of said arrangements or transactions.

FHA

FHA analyzed its loan portfolio and programs and determined that all of its programs meet the "Conclusive Characteristics" identified in *SFFAS No. 49: Public-Private Partnerships: Disclosure Requirements*. FHA's portfolio is comprised of loan guarantees and direct loans for Single-Family, Multifamily, and Healthcare programs. The structure of these loan guarantees and direct loans also fall under the definition of Public-Private Partnerships (P3s), based on Conclusive Risk Characteristics established in *SFFAS No. 49*. Accordingly, FHA is required to disclose its P3s and related information. Most of the disclosure requirements are covered by FHA's other disclosure requirements, notably those under *SFFAS No. 2: Accounting for Direct Loans and Loan Guarantees* and are included in HUD and FHA standalone notes. These are as follows; FHA standalone Note (1), HUD and FHA standalone Notes (6) and (7), FHA standalone Notes (13), (14), (19), and (20), and HUD Note (16) which is FHA's standalone Note (12). Additional required disclosures are covered by this note. FHA standalone notes for FY 2019 can be found in its Annual Management Report at the following site: https://www.hud.gov/federal_housing_administration, in the In Focus section.

Given the number of lenders, borrowers, and other counterparties that participate in FHA's programs, individual disclosure of these partnerships is impractical. Accordingly, FHA aggregates and reports its P3 information by program and fund, as outlined in FHA's Entity and Mission section in FHA's standalone Note (1).

The purpose and objective of FHA's P3 arrangements, as well as the statutory authority, are addressed in FHA's standalone Note (1) Significant Accounting Policies, Entity and Mission section, as well as in its introduction to FHA's standalone Note (7) Direct Loans and Loan Guarantees.

The operational and financial structure of FHA's P3 arrangements, along with its rights and responsibilities, are governed by the *Housing Act of 1934* and subsequent amendments, as well as other statutory authority covered in FHA's standalone Note (1). FHA's private sector partners must apply and be approved to issue FHA-insured mortgages, and once approved they agree to comply with FHA requirements, which vary depending on the program area. Additional FHA responsibilities and requirements for FHA's private sector partners are established in FHA's regulations, handbooks, and mortgagee letters. These partnerships continue indefinitely as long as FHA's partners comply with FHA requirements. FHA's private sector partners benefit from their relationship with FHA because FHA guarantees loans and mortgages that meet FHA requirements for insurance. FHA benefits because it can carry out its mission through these P3 arrangements.

Contractual terms governing payments to and from the government over the expected life of the P3 arrangement are covered in FHA's regulations, handbooks, and mortgagee letters. The basic structure of these arrangements is that FHA provides either a direct loan or a loan guarantee to a borrower or lender, respectively. In return, the borrower in the arrangement pays a premium for the loan guarantee to FHA, through the lender, and interest for a direct loan either directly to FHA or through a custodian. FHA assumes the loan under its loan guarantee arrangements if the underlying borrower defaults on the loan provided by FHA's partner, i.e. lender, and pays a claim directly to the lender. The expected life of FHA's arrangements varies by program, however most of FHA's loan guarantees and direct loans have 15-year to 30-year terms, with fixed interest rates.

The relative benefits being received by FHA as a result of its P3 arrangements are covered by FHA's standalone Note (14) Earned Revenues and standalone Note (19) Budgetary Resources-Collections. Earned revenues/benefits consist of insurance premium revenue, income from notes and property, and other revenues earned with the public. Premiums, notes, property, and collections from settlements, and are non-federal funding received by FHA as a result of its P3 arrangements for the current year. The aggregate amount of revenue to be received over the life of these P3 arrangements cannot be reported separately, in accordance with Credit Reform, and is instead reported as part FHA's individual program Loan Liability Guarantee (LLG) and total FHA Loan Guarantee Liability (LGL) in HUD's Note (7K) and FHA standalone Note (7).

The government's consideration for entering into these P3 arrangements is covered by FHA's standalone Note (13) Gross Costs and standalone Note (20) Budgetary Resources-Obligations. FHA's consideration, or costs, consist of claims paid to lenders, property expenses, interest on borrowings, subsidy costs, re-estimate costs, FFB direct loan costs, bad debt expense, loan loss reserve, and interest accumulation expense costs.

Funding over the expected life of FHA's P3 arrangements, in the form of net potential future losses, is covered in the entirety of HUD's and FHA's standalone Note (7), in each FHA program's LLG and FHA's total LGL on its BS. The LLG is calculated as the net present value of anticipated cash outflows and cash inflows. Anticipated cash outflows include lender claims arising from borrower defaults (i.e., claim payments), premium refunds, property costs to maintain foreclosed properties arising from future defaults and selling costs for the properties. Anticipated cash inflows include premium receipts, proceeds from asset sales and principal and interest on Secretary-Held Notes.

Identification of the contractual risks of loss that P3 partners are undertaking, including contractual risks and the potential effect on cash flows if the risks were realized, are not practical from an individual partner level due to the number of lenders, borrowers, and other counterparties that participate in FHA programs. Instead, these risks are aggregated and captured in HUD and FHA's standalone Note (7). The Credit Reform Valuation Methodology section of FHA's standalone Note (7) in particular, discloses and identifies risks associated with Credit Reform programs, which are the basis of FHA's P3 arrangements. They would also be reflected in the re-estimate expense reported under FHA's standalone Note (13). Gains or losses recognized by FHA would also be reflected FHA's standalone in Note (13), and capitalized items would be reflected in HUD's Note (7K) and FHA's standalone Note (7) as part of each program's LLG and over-all LGL.

Significant instances of non-compliance by FHA with legal and contractual provisions governing the P3 arrangements are reported under HUD's Note (16) Contingencies and FHA's standalone Note (12) Commitments and Contingencies. Significant instances of non-compliance by lenders in these same P3 arrangements, are reported as settlement agreement receivables and payments received. Receivables from settlement agreements are reported under HUD's Note (6) FHA Criminal Restitution and FHA's standalone Note (6) Accounts Receivable – Settlement Receivables, and payments received are reported under HUD's FHA Note (7K) and in FHA's standalone Note (7), in accordance with the FCRA, as part of the MMI/CMHI Loan Guarantee Liability, Net for the Single-Family Forward program. Settlement payments received from individual counterparties for non-compliance with FHA's P3 arrangements totaled $11.3 million in FY 2019.

Given the large number of lenders, borrowers, and other counterparties that participate in FHA program, it would be impossible for FHA to determine if FHA's private partners have borrowed or invested capital contingent upon FHA's loan guarantees or direct loans. However, at the aggregate level, FHA's programs are designed to serve as a guarantee for lenders and in turn make mortgage financing more accessible to the home-buying public. This is disclosed in the Entity and Mission section of FHA's standalone Note (1).

Description of events of termination or default are not practical from an individual loan guarantee or direct loan perspective in most cases, given the large number of loans or guarantees. However, FHA-approved lenders are contractually obligated to follow FHA guidelines and are subject to oversight by FHA staff.   FHA's relationship with a lender may be terminated if FHA determines that the lender did not comply with FHA guidelines.

Ginnie Mae

Ginnie Mae analyzed the MBS Guaranty program and determined that it meets the "Conclusive Characteristics" identified in *SFFAS No. 49: Public-Private Partnerships: Disclosure Requirements*. Accordingly, Ginnie Mae is required to disclose its Public-Private Partnerships and related information.

Purpose, objective and rationale for P3 arrangement:

Ginnie Mae's mission is to bring global capital into the housing finance market to help make affordable housing possible for low and moderate-income households across America. The MBS Guaranty program represents Ginnie Mae's operational model to accomplish this goal. The MBS Guaranty program reduces risk to the U.S. Government while efficiently promoting stability and liquidity by guaranteeing a simple pass-through security to lenders of qualified loans insured or guaranteed by FHA, RD, VA, and PIH, without the need for Ginnie Mae to buy loans and issue its own securities. The Ginnie Mae MBS Guaranty allows mortgage lenders to obtain a better price for their mortgage loans in the secondary mortgage market. The lenders then use the proceeds to fund new mortgage loans available to households. Ginnie Mae's activities are self-financed and do not require financial assistance from the U.S. Government. Rather, Ginnie Mae generates income primarily through Guaranty fees. Guaranty fees are income streams earned for providing Ginnie Mae's guaranty. These fees are received over the life of the outstanding securities. Guaranty fees are collected on the aggregate UPB of the guaranteed securities outstanding.

Statutory Authority:

Statutory authority for the program is disclosed in Note (17) Funds from Dedicated Collections.

Description of federal and non-federal funding structure:

All funding for the MBS Guaranty Program is provided by dedicated collections from non-federal sources as described in Note (17), and no federal funding is required or used, with the exception of claims by Ginnie Mae on federal mortgage loan insurance or guarantees for individual loans which Ginnie Mae may purchase out of MBS pools as part of its loss mitigation efforts following an issuer default event. For details on these claims, refer to Note (8) Other Non-Credit Reform Loans, Section B8. Claims Receivable, Net.

Contractual terms governing payment:

Ginnie Mae's MBS Guaranty is contingent on timely payments of the P&I to investors in Ginnie Mae MBS issued by issuers. In exchange for the guaranty, issuers pay a monthly guaranty fee to Ginnie Mae. The underlying terms of the guaranty generally range from 15 to 30 years for single-family programs. For multifamily programs, the maximum guaranty term is capped at 40 years plus the applicable construction period. MBS guaranty fees were $1,318 million in fiscal year 2019, which are included in Earned Revenue in the accompanying Statement of Net Cost. Ginnie Mae has calculated a Guaranty Asset of $7,113 million at September 30, 2019 which represents the discounted cash flows of the expected future premiums from guaranty fees over the expected life of the mortgage pools, as amortized for declines in the UPB of the guaranteed MBS outstanding in the guaranteed portfolio. This amount is included in the determination of the Liability for Losses on Remaining Coverage as more fully described in Note (25) Insurance Programs. The outstanding MBS portfolio balance at the end of fiscal year 2019 was $2,092,829 million. This balance represents off-balance sheet risk and is considered in determining the Liability for Losses on Remaining Coverage.

Identification of contractual risk of loss:

Identification of the contractual risks of loss that P3 partners are undertaking, including contractual risks and the potential effect on cash flows if the risks were realized, are not practical from an individual partner level. Instead, these risks are aggregated and disclosed as liability for loss on remaining coverage in Note (25) Insurance Program.

Off balance-sheet exposures:

Ginnie Mae's guarantees of MBS are considered financial instruments with off-balance sheet risk. These securities are backed by pools of mortgage loans insured by FHA, PIH, and Rural Housing Service, and are guaranteed by the VA. Ginnie Mae is exposed to credit loss in the event of non-performance by other parties to the financial instruments. In the event of default, the underlying mortgages serve as primary collateral, and FHA, RD, VA and PIH insurance or guaranty indemnifies Ginnie Mae for most losses.

During the mortgage closing period and prior to granting its guaranty, Ginnie Mae enters into commitments to guarantee MBS. The commitment ends when the MBS are issued or when the commitment period expires. While Ginnie Mae's risks related to outstanding commitments are much less than outstanding securities due in part to the Federal guaranty on the underlying portfolio, Ginnie Mae is also able to mitigate risk through its ability to limit commitment authority granted to individual issuers of MBS. Generally, the MBS pools are diversified among issuers and geographic areas. No significant geographic concentrations of credit risk exist; however, to a limited extent, securities are concentrated among issuers.

Other applicable disclosures:

Financial operations of Ginnie Mae can be affected by large unanticipated losses from defaults by issuers and by an inability to sell the underlying collateral for an amount sufficient to recover all costs incurred. Ginnie Mae is not aware of any instances of non-compliance with its P3 arrangements in FY 2019. Three issuer defaults occurred in the 12 months ended September 30, 2019, as described in Note (8) Other Non-Credit Reform Loans, Section A. Advances, Net.

HUD Proper

HUD Proper analyzed its programs and determined there are programs that meet criteria identified in *SFFAS No. 49: Public-Private Partnerships.* Some of these programs were not subject to the provisions of *SFFAS No. 49* due to exclusions such as 1) programs that provide grants to state, local and Indian tribal governments; 2) programs with formal and informal arrangements or transactions that do not share risks or rewards and solely designed to foster goodwill, encourage economic development, promote research and innovation or coordinate and integrate strategic initiatives and 3) programs with acquisitions of supplies and services made pursuant to the FAR Simplified Acquisition Procedures (FAR Part 13). Other HUD Proper programs such as the credit reform programs did not meet the exclusion requirements but did meet most of the conclusive characteristics. Accordingly, HUD Proper is required to disclose its Public-Private Partnerships (P3) and related information for those credit reform programs. Most of the disclosure requirements are covered by other HUD Proper disclosure requirements, such as those under *SFFAS No. 2: Accounting for Direct Loans and Loan Guarantees,* and are included in Notes (1) Summary of Significant Accounting Policies, Note (7) Direct Loans and Loan Guarantee, Non-Federal Borrowers, Note (19) Net Costs of HUD's Cross-Cutting Programs, and Note (20) Undelivered Orders and Commitments under HUD's Grant, Subsidy, and Loan Programs. Additional required disclosures are covered by this note. Given the number of lenders, borrowers, and other counterparties that participate in HUD Proper programs, individual disclosure of these partnerships is impractical. Accordingly, HUD Proper aggregates and reports its P3 information by program and fund, as outlined in HUD's Note (1) Summary of Significant Accounting Policies, Reporting Entity section. The purpose and objective of HUD Proper's P3 arrangements, as well as the statutory authority, are addressed in Note (1) Summary of Significant Accounting Policies, Credit Reform Accounting section, as well as in Note (7) Direct Loans and Loan Guarantees, Non-Federal Borrowers, Section A under HUD Proper heading.

HUD benefits because it can carry out the mission of the agency and its programs through these P3 arrangements. The private lenders benefit because they can issue loans guaranteed by the government (HUD) and collect fee revenues as a result. The borrowers (including Elderly and Disabled Multifamily Project Owners, Native Americans, Native Hawaiians, and owners of certain community and economic development projects) benefit from their relationship with HUD because it enables them to qualify and obtain guaranteed or direct loans and mortgages that they may not otherwise be able to obtain in the regular market.

The relative monetary benefits being received by HUD Proper as a result of its P3 arrangements are covered by Note (7) Section N Fees and Other Collections for the current year only. These amounts are included in Note (19) Net Costs of HUD's Cross-Cutting Programs disclosures as well as the Consolidated Statement of Net Costs. Amounts to be collected over the life of the arrangements are unknown.

The operational and financial structure of the HUD Proper P3 arrangements, along with its rights and responsibilities, and contractual terms governing payments to and from the government over the expected life of the P3 arrangement are governed by and covered in various statutory authorities as noted in Note (7) Section A HUD Proper as well as other statutory authority covered in Note (1) under Credit Reform Accounting and Credit Program Receivables and Related Foreclosed Property Sections. Private lenders must apply and be approved to issue loans or mortgages under these programs, and once approved they agree to comply with HUD requirements, which vary depending on the program area.

The basic structure of these arrangements is that HUD provides either a loan guarantee or provided a direct loan to a lender or borrower, respectively. In return, the borrower in the arrangement pays a fee for the loan guarantee, through the lender, and pay interest for a direct loan directly to HUD. HUD assumes the loan under its loan guarantee arrangements if the underlying borrower defaults on the loan provided by our private partner, i.e. lender, and pays a claim directly to the lender. The expected life of these arrangements varies by program; however, most loan guarantees and direct loans have 15-year to 30-year terms, with fixed interest rates.

Identification of the contractual risks of loss that P3 partners are undertaking, including contractual risks and the potential effect on cash flows if the risks were realized, are not practical from an individual partner level. Instead, these risks are aggregated and disclosed as loan guarantees and direct loans in Note (7) Direct Loans and Loan Guarantee, Non-Federal Borrowers. Funding over the expected life of the P3 arrangements, in the form of net potential future losses, is covered in Note (7K) All Other Loan Liability Guaranty (LLG) and HUD Proper's (non-FHA) Loan Guarantee Liability (LGL) on its balance sheet. The LLG is calculated as the net present value of anticipated cash outflows and cash inflows.

HUD Proper is not aware of any instances of non-compliance in their P3 arrangements in FY 2019. In addition, description of events of termination or default are not practical from an individual loan guarantee or direct loan perspective in most cases, given the large number of loans or guarantees, unless material. There were no material instances of terminations or defaults.

Note 25: Insurance Programs

The *SFFAS No. 51, Insurance Programs*, establishes accounting and reporting standards for insurance programs to ensure they are adequately defined and report consistent information about the liabilities for losses incurred and claimed as well as expected losses during the remaining coverage. *SFFAS No. 51* became effective for periods beginning after September 30, 2018 and applies when a reporting entity is presenting General Purpose Federal Financial Reports (GPFFRs) in conformance with GAAP as defined by paragraphs 5 through 8 of *SFFAS No. 34: The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*.

HUD Proper and FHA administers some direct loans and loan guarantee programs that meet the definition of insurance programs; however, they are excluded from this provision as noted in paragraph 6 of the standard.

Ginnie Mae's MBS program guarantees the timely payment of P&I on securities backed by pools of mortgage loans insured by FHA, PIH and Rural Housing Service, or guaranteed by the VA. Ginnie Mae's MBS Guaranty program is considered an exchange transaction insurance program other than life insurance under *SFFAS No. 51: Insurance Programs*. Ginnie Mae's principal risk associated with the MBS Guaranty program is default risk. When estimating defaults, prepayments and recovery, Ginnie Mae considers a few indicators including macro-economic factors such as interest rates, home price indices, and unemployment rates. In addition, Ginnie Mae considers several credit quality indicators such as LTV ratios, current delinquency status, and recent payment history over the past twelve months. Ginnie also considers significant management judgment and estimates of credit losses inherent in the mortgage loan portfolio. At September 30, 2019, the UPB of Ginnie Mae's MBS securities amounted to $2,092,829 million which represents the maximum potential exposure risk to the program. It should be noted, however, that Ginnie Mae's potential loss is considerably less due to the financial strength of its issuers. In addition, the value of the underlying collateral and the insurance provided by insuring or guaranteeing agencies indemnify Ginnie Mae for most losses.

In accordance with the requirements of *SFFAS No. 51*, Ginnie Mae is required to recognize and disclose Revenue and Liability for Unearned Premiums; Liability for Unpaid Insurance Claims; and Liability for Losses on Remaining Coverage for its MBS Guaranty program.

Revenue and Liability for Unearned Premiums

Ginnie Mae guarantees the timely payment of P&I on MBS issued by approved issuers. In exchange for providing the guaranty, Ginnie Mae receives guaranty fees from the issuers on the UPB of the outstanding MBS in the non-defaulted issuer portfolio. These fees are received and recognized on a monthly basis over the contractual period that the guaranty is provided, and a liability for unearned premiums is recognized in the amount of the premiums collected but not earned on a monthly basis in accordance with the requirements of *SFFAS No. 51: Insurance Programs* and *SFFAS No. 7: Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*. The monthly guaranty fees received are a result of Ginnie Mae "lending" its creditworthiness to the issuer to enhance the issuer's ability to borrow funds from investors.

Pricing of the guaranty fees is prescribed by *12.U.S.C. 1721 Management and liquidation functions of Government National Mortgage Association*, which provides for a fee of 6 basis points for Single-Family Programs, 30 basis points for Manufactured Housing Program, and 13 basis points for Multifamily Housing Programs.

Ginnie Mae had guaranty fee revenue of $1,318 million for the year ended September 30, 2019.

Liability for Unpaid Insurance Claims

Ginnie Mae defines the “adverse event” which triggers exercise of its guaranty primarily as default by the Single-Family MBS issuer, which can occur for inability or failure to make pass-through payments to MBS holders, or other violations of Ginnie Mae requirements. For Multifamily, the “adverse event” is trigged in the event of a loan default, pursuant to the Multifamily guaranty agreement. Ginnie Mae is responsible for missed pass-through payments; however, any such pass-through payments are made immediately when due by Ginnie Mae to satisfy the terms of the guaranty agreement and the expectations of MBS holders to receive timely payment. As a result, Ginnie Mae does not have any liability for unpaid insurance claims as of September 30, 2019.

Liability for Loss on Remaining Coverage

Ginnie Mae determines its liability for loss on remaining coverage associated with outstanding MBS guarantees as the total non-contingent guaranty obligation and contingent liability less the total guaranty asset. If this amount is positive, indicating that losses are expected to exceed projected receipts of guaranty fees, this amount is recorded as the liability for loss on remaining coverage and is included in Other Liabilities on the Balance Sheet. Initial recognition and subsequent changes in the liability for loss on remaining coverage are reflected on the Balance Sheet and are recorded as a loss included in gross cost in the Statement of Net Cost. If the net amount is positive, that is the projected receipts of guaranty fees will exceed expected losses, no liability for loss on remaining coverage is recognized. During the third quarter of FY 2019, OER changed its default and prepayment modeling assumptions to incorporate additional inputs (i.e., change of estimates, including macroeconomic data at more granular, metropolitan statistical area (MSA) level that became available to Ginnie Mae through Moody’s Analytics). These additional inputs resulted in a $2,390 million decrease in the total guaranty asset (GA). This change in estimate caused the net non-contingent guaranty obligation and contingent liability to exceed the GA as of June 30, 2019. At September 30, 2019, the net non-contingent guaranty obligation and contingent liability continued to exceed the GA. At September 30, 2019, the liability for loss on remaining coverage was $972 million, which was recognized and included in gross cost for the year ended September 30, 2019.

The issuance of a guaranty under the MBS program obligates Ginnie Mae to stand ready to perform under the terms of the guaranty. Ginnie Mae’s GA represents the net present value of expected collections of guaranty fees associated with outstanding Ginnie Mae guaranteed MBS and is determined through a modeling process maintained by the Office of Enterprise Risk. The corresponding guaranty obligation (GO) represents the non-contingent liability for Ginnie Mae’s obligation to perform under its guaranty.

The GO is derived based on the market price of the guaranty, which represents the fair compensation the market would require making such a guaranty and is amortized systematically over the term of the MBS based on the amount of outstanding UPB for underlying loans. Ginnie Mae also records a contingent liability when it is probable that an issuer will default and the amount of the loss or a range of loss can be reasonably estimated. The contingent liability is measured initially and in subsequent periods in accordance with *SFFAS No. 5: Accounting for Liabilities of the Federal Government – Contingencies*. Once it is determined that an issuer default is probable to occur, Ginnie Mae estimates the probable credit losses in the underlying loan portfolio to calculate the loss contingency.

Determining a contingent liability requires considerable management judgment including the evaluation of the likelihood that future events will confirm the loss. When assessing whether it is probable that a default will occur, management takes into consideration various factors including the issuer's financial and operational vulnerability, a qualitative and quantitative corporate credit analysis, other evidence of potential default (e.g., known regulatory investigations or actions), interest rates, and general economic conditions.

Note 26: Reclassification of Balance Sheet, Statement of Net Cost, and Statement of Changes in Net Position

To prepare the Financial Report of the U.S. Government (FR), the Department of the Treasury requires agencies to submit an adjusted trial balance, which is a listing of amounts by U.S. Standard General Ledger account that appear in the financial statements. Treasury uses the trial balance information reported in the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS) to develop a Reclassified Balance Sheet, Reclassified Statement of Net Cost, and a Reclassified Statement of Changes in Net Position for each agency, which are accessed using GTAS. Treasury eliminates all intragovernmental balances from the reclassified statements and aggregates lines with the same title to develop the FR statements. HUD's financial statements and HUD's reclassified statements prior to elimination of intragovernmental balances and prior to aggregation of repeated FR line items. The term "non-Federal" is used in this note to refer to Federal Government amounts that result from transactions with non-Federal entities. These include transactions with individuals, businesses, non-profit entities, and State, local, and foreign governments. A copy of the 2018 FR can be found here: https://www.fiscal.treasury.gov/reports-statements/ and a copy of the 2019 FR will be posted to this site as soon as it is released.

The Net Position section of the Balance Sheet presented in HUD's accompanying Balance Sheet is shown before eliminations, or "Combined." This is consistent with HUD's presentation of a "combining" Statement of Change in Net Position in the accompanying Balance Sheet. The Reclassified Balance Sheet from GTAS differs from HUD's accompanying Balance Sheet in that it elects to show two lines with no distinction between Cumulative Results of Operations and Unexpended Appropriations

“Funds from Dedicated Collections” and “All Other Funds”. Whereas, HUD’s accompanying Balance Sheet shows four lines with the distinction between “Funds from Dedicated Collections” and “All Other Funds.” HUD’s accompanying Balance Sheet has “Other Non-Credit Reform” and “PIH Prepayment and Advances” shown as separate lines, per Treasury’s crosswalk for the AFR Financial Statement reconciliation side, these lines crosswalk to “Direct Loan and Loan Guarantees, Net” and “Other” lines respectively.

Under the Reclassified Balance sheet column of the reconciliation, HUD captured FHA’s manual adjustments for deferred debits and deferred credit entries. There is also a reclass entry between FHA’s LLG and the Ginnie Mae allowance. The Reclassified Balance Sheet lines that were impacted by the manual adjustments are Accounts and Taxes Receivable, Loans Receivable, Other Assets, Accounts payable, Loan Guarantee Liabilities, and Other Liabilities.

Note 26: Reclassification of Balance Sheet to Line Items Used for the Government-wide Balance Sheet

For The Year Ended September 30, 2019

(Dollars in Millions)

FY 2019 U.S. Department of Housing and Urban Development Balance Sheet Financial Statement Line	Amounts	Amounts	Line Items Used to Prepare FY 2019 Government-wide Balance Sheet Reclassified Financial Statement Line
ASSETS			**ASSETS**
Intragovernmental Assets			**Intragovernmental Assets**
FBWT	$ 110,743	$ 110,743	FBWT
Investments, Net	$ 66,120	$ 66,047	Federal Investments
		73	Interest Receivable - Investments
Total Investments, Net	**$ 66,120**	**$ 66,120**	*Total Reclassified Investments, Net*
Accounts Receivable	$ -	$ -	Accounts Receivable
		-	Accounts Receivable, Capital Transfers
		-	Interest Receivable - Loans and Not Otherwise Classified
		-	Transfers Receivable
		-	Benefit Program Contributions Receivable
Total Accounts Receivable	**$ -**	**$ -**	*Total Reclassified Accounts Receivable*
Loans Receivable, Net	-	-	Loans Receivable, Net
Other	$ 33	$ 33	Advances to Others and Prepayments
		-	Other Assets
Total Other	**$ 33**	**$ 33**	*Total Reclassified Other*
Total Intragovernmental Assets	**$ 176,896**	**$ 176,896**	**Total Intragovernmental Assets**
Cash and Other Monetary Assets	$ 126	$ 126	Cash and Other Monetary Assets
Investments, Net	$ 6	$ 6	Debt and Equity Securities
		-	Investments in Government-Sponsored Enterprises
Total Investments, Net	**$ 6**	**$ 6**	*Total Reclassified Investments, Net*
Accounts Receivable, Net	$ 513	$ 513	Accounts and Taxes Receivable, Net
Taxes Receivable, Net	-		
Direct Loan and Loan Guarantees, Net	39,325	39,325	Loans Receivable, Net
Inventory and Related Property, Net	-	-	Inventory and Related Property, Net
General PP&E, Net	85	85	PP&E, Net
Other	629	629	Other Assets
Total Assets	**$ 217,580**	**$ 217,580**	**Total Assets**
LIABILITIES			**LIABILITIES**
Intragovernmental Liabilities			**Intragovernmental Liabilities**
Accounts Payable	$ 67	$ 76	Accounts Payable
		-	Transfers Payable
Total Accounts Payable	**$ 67**	**$ 76**	*Total Reclassified Accounts Payable*
Debt	**$ 32,384**	**$ 32,379**	Loans Payable
		-	Federal Debt
		-	Interest Payable, Debt
		5	Interest Payable - Loans and Not Otherwise Classified
Total Debt	**$ 32,384**	**$ 32,384**	*Total Reclassified Debt*
Other Liabilities	$ 3,528	$ 21	Benefit Program Contributions Payable
		3	Other Liabilities
		7	Advances from Others and Deferred Credits
		3,488	Liabilities to the General Fund of the U.S. Government for Custodial and Other Non-Entity Assets
Total Other - Miscellaneous Liabilities	**$ 3,528**	**$ 3,519**	*Total Reclassified Other - Miscellaneous Liabilities*
Total Intragovernmental Liabilities	**$ 35,979**	**$ 35,979**	**Total Intragovernmental Liabilities**
Accounts Payable	825	825	Accounts Payable
Debt Held by the Public	2	-	Federal Debt
Loan Guarantee Liability	2,514	2,514	Loan Guarantee Liability
Federal Employee and Veteran Benefits	60	63	Federal Employee and Veteran Benefits Payable
Environmental and Disposal Liabilities	-	-	Environmental and Disposal Liabilities
Benefits Due and Payable	-	-	Benefits Due and Payable
Other Liabilities	2,389	2,704	Other Liabilities
Accrued Grant Liabilities	1,288		
Loss Reserves	-		
		972	Insurance and Guarantee Program Liabilities
Total Liabilities	**$ 43,057**	**$ 43,057**	**Total Liabilities**
NET POSITION			**NET POSITION**
Unexpended Appropriations - Funds from Dedicated Collections	**$ -**	**$ -**	Unexpended Appropriations - Funds from Dedicated Collections
Unexpended Appropriations - All Other Funds	86,250	86,250	Unexpended Appropriations - All Other Funds
Cumulative Results of Operations - Funds From Dedicated Collections	25,859	25,863	Cumulative Results of Operations - Funds From Dedicated Collections
Cumulative Results of Operations - All Other Funds	62,414	62,410	Cumulative Results of Operations - All Other Funds
Total Net Position	**$ 174,523**	**$ 174,523**	**Total Net Position**
Total Liabilities and Net Position	**$ 217,580**	**$ 217,580**	**Total Liabilities & Net Position**

Note 26: Reclassification of Statement of Net Cost to Line Items Used for the Government-wide Statement of Net Cost
For The Year Ended September 30, 2019
(Dollars in Millions)

FY 2019 U.S. Department of Housing and Urban Development SNC Financial Statement Line		Amounts		Line Items Used to Prepare FY 2019 Government-wide SNC Amounts	Reclassified Financial Statement Line
					Non-Federal Costs
Gross Costs	$	30,770	$	28,751	Non-Federal Gross Cost
				-	Interest on Debt Held by the Public
				-	General Property Plant and Equipment (PP&E) Partial Impairment Loss
			$	**28,751**	***Total Non-Federal Costs***
					Intragovernmental Costs
			$	188	Benefit Program Costs
				79	Imputed Costs
				469	Buy/Sell Costs
				3	Purchase of Assets
				-	Federal Securities Interest Expense
				1,224	Borrowing and Other Interest Expense
				-	Borrowing Losses
				59	Other Expenses (w/o Reciprocals)
				(3)	Purchase of Assets Offset
				2,019	***Total Intragovernmental Costs***
Total Gross Costs	**$**	**30,770**	**$**	**30,770**	***Total Reclassified Gross Costs***
Earned Revenue	**$**	**(3,676)**	**$**	**(1,772)**	Non-Federal Earned Revenue
					Intragovernmental Revenue
			$	(6)	Buy/Sell Revenue
				-	Benefit Program Revenue
				(1,165)	Federal Securities Interest Revenue Including Associated Gains/Losses (Exchange)
				(733)	Borrowing and Other Interest Revenue
				-	Borrowing Gains
				(1,904)	***Total Intragovernmental Earned Revenue***
Total Earned Revenue	**$**	**(3,676)**	**$**	**(3,676)**	***Total Reclassified Earned Revenue***
(Gain)/Loss on Pension, ORB, or OPEB Assumption Changes		-		-	Gains/Losses from Changes in Actuarial Assumptions
Total Net Cost of Operations	**$**	**27,094**	**$**	**27,094**	***Total Net Cost of Operations***

Note 26: Reclassification of Statement of Changes in Net Position to Line Items Used for Government-wide Statement of Operations and Changes in Net Position
For the Period Ended September 30, 2019
(Dollars in Millions)

FY 2019 U.S. Department of Housing and Urban Development SCNP Financial Statement Line	Amounts	Amounts	Line Items Used to Prepare FY 2019 Government-wide SCNP Reclassified Financial Statement Line
UNEXPENDED APPROPRIATIONS			
Unexpended Appropriations, Beginning Balance	$ 81,697	$ 81,697	Net Position, Beginning of Period
Changes in Accounting Principles	-	-	Changes in Accounting Principles - Federal
		-	Changes in Accounting Principles - Non-Federal
		575	Corrections of Errors - Federal
Corrections of Errors	575	-	Corrections of Errors - Non-Federal
		-	Corrections of Errors – Years Preceding the Prior Year - Federal
		-	Corrections of Errors – Years Preceding the Prior Year - Non-Federal
Total Corrections of Errors	***575***	***575***	***Total Reclassified Corrections of Errors***
Appropriations Received	$ 59,193	58,628	Appropriations Received as Adjusted
Other Adjustments	(565)		
		-	Non-Expenditure Transfers-In of Unexpended Appropriations and Financing Sources (Federal)
Appropriations Transferred-in/out	-	-	Non-Expenditure Transfers-Out of Unexpended Appropriations and Financing Sources (Federal)
Total Appropriations Transferred-in/out	-	-	*Total Reclassified Appropriations Transferred-in/out*
Appropriations Used	(54,650)	(54,650)	Appropriations Used (Federal)
Total Unexpended Appropriations	**$ 86,250**	**$ 86,250**	Total Unexpended Appropriations
CUMULATIVE RESULTS OF OPERATIONS			
Cumulative Results, Beginning Balance	$ 64,254	$ 64,254	Net Position, Beginning of Period
Changes in Accounting Principles	(282)	-	Changes in Accounting Principles - Federal
		(282)	Changes in Accounting Principles - Non-Federal
		(575)	Corrections of Errors - Federal
Correction of Errors	(451)	124	Corrections of Errors - Non-Federal
		-	Corrections of Errors – Years Preceding the Prior Year - Federal
		-	Corrections of Errors – Years Preceding the Prior Year - Non-Federal
Other Adjustments	(10)	(10)	Other Budgetary Financing Sources
			Non-Federal Nonexchange Revenues
		$ -	Individual Income Tax and Tax Withholdings
		-	Corporation Income Taxes
		-	Excise Taxes
		-	Unemployment Taxes
		-	Customs Duties
		-	Estate and Gift Taxes
		15	Other Taxes and Receipts
Nonexchange Revenues	$ 15	***$ 15***	***Total Non-Federal Nonexchange Revenues***
			Intragovernmental Nonexchange Revenue
		$ -	Federal Securities Interest Revenue, including Associated Gains/Losses (Nonexchange)
		-	Borrowings and Other Interest Revenue (Nonexchange)
		-	Benefit Program Revenue (Nonexchange)
		-	Accruals for Agency Amounts to be Collected in a TAS Other than the General Fund
		-	Other Taxes and Receipts
		$ -	***Total Intragovernmental Nonexchange Revenues***
Total Nonexchange Revenues	***$ 15***	***$ 15***	*Total Reclassified Nonexchange Revenues*
Donations and Forfeitures of Property	$ -	$ -	Other Taxes and Receipts (Non-Federal) - Donations and Forfeitures of Property
		-	Appropriation of Unavailable Special/Trust Fund Receipts Transfers-In
		-	Appropriation of Unavailable Special/Trust Fund Receipts Transfers-Out
		-	Non-Expenditure Transfers-In of Unexpended Appropriations and Financing Sources
		-	Non-Expenditure Transfers-Out of Unexpended Appropriations and Financing Sources
Transfers-in/out without Reimbursement - Budgetary	$ (5)	-	Expenditure Transfers-In of Financing Sources
		(5)	Expenditure Transfers-Out of Financing Sources
		-	Transfers-In without Reimbursement
		-	Transfers-Out without Reimbursement
		-	Other Non-Budgetary Financing Sources
		$ (5)	**Total Reclassified Transfers-In/Out without Reimbursement - Budgetary (Federal)**
Total Transfers-In/Out without Reimbursement - Budgetary	***$ (5)***	***$ (5)***	*Total Reclassified Transfers-In/Out without Reimbursement - Budgetary*
			Non-Federal Other
		$ 123	Other Taxes and Receipts
		-	Miscellaneous Earned Revenues
		$ 123	***Total Non-Federal Other***
			Intragovernmental Other
		$ -	Miscellaneous Earned Revenues
Other	$ (2,884)	-	Federal Securities Interest Revenue including Associated Gains/Losses (Nonexchange)
		-	Borrowing and Other Interest Revenue (Nonexchange)
		(3,007)	Accrual of Collections Yet to be Transferred to a TAS Other than the General Fund
		-	Other Budgetary Financing Sources
		-	Other Taxes and Receipts
		$ (3,007)	***Total Intragovernmental Other***
Total Other	***$ (2,884)***	***$ (2,884)***	*Total Reclassified Other*
Donations and Forfeitures of Cash and Cash Equivalents	$ -	$ -	Other Taxes and Receipts (Non-Federal) - Donations and Forfeitures of Cash and Cash Equivalents
Imputed Financing	80	80	Imputed Financing Sources (Federal)
Appropriations Used	54,650	54,650	Appropriations Used
Total Financing Sources	**$ 51,846**	**$ -**	
Net Cost of Operations	**(27,094)**	**(27,094)**	**Net Cost of Operations**
Ending Balance - Cumulative Results of Operations	**88,273**	**88,273**	**Net Position - Ending Balance**
Total Net Position	**174,523**	**174,523**	**Total Net Position**

UNAUDITED

Required Supplementary Stewardship Information (RSSI)

As discussed in this document, HUD implemented several new processes to improve its internal financial controls and its financial statement close processes, which addressed several issues previously reported by the Office of Inspector General (OIG). In some instances, the extent of HUD's improvements required the OIG to conduct additional testing procedures, which required additional time for OIG to complete its audit process. Related to GNMA, GNMA fully implemented the subledger database, but the audit process and audit procedures could not be completed in a timely manner, resulting in a qualified opinion and delayed audit report.

Introduction

This narrative provides information on resources utilized by HUD that do not meet the criteria for information required to be reported or audited in HUD's financial statements but are, nonetheless, important to understand investments made by HUD for the benefit of the Nation. The stewardship objective requires that HUD also report on the broad outcomes of its actions associated with these resources. Such reporting provides information that helps the reader to better assess the impact of HUD's operations and activities.

HUD's stewardship reporting responsibilities extend to the investments made by a number of HUD programs in Non-Federal Physical Property, Human Capital, and Research and Development. Due to the relative immateriality of the amounts and in the application of the related administrative costs, most of the investments reported reflect direct program costs only. The investments addressed in this narrative are attributable to programs administered through the following divisions/departments:

- Community Planning and Development (CPD),
- Public and Indian Housing (PIH), and
- Office of Lead Hazard Control and Healthy Homes (OLHCHH).

Overview of HUD's Major Programs

CPD seeks to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income persons. HUD makes stewardship investments through the following CPD programs:

- **CDBGs** are provided to state and local communities, which use these funds to support a wide variety of community development activities within their jurisdictions. These activities are designed to benefit low and moderate-income persons, aid in the prevention of slums and blight, and meet other urgent community development needs. State and local communities use the funds as they deem necessary, as long as the use of these funds meet at least one of these objectives. A portion of the funds supports the acquisition, construction or rehabilitation of permanent, residential structures that qualify as occupied by and benefiting low and moderate-income persons, while other funds help to provide employment and job training to low and moderate-income persons.
- **Disaster Recovery Assistance (Disaster Grants/CDBG-DR)** is a CDBG program that helps state and local governments recover from major natural disasters. A portion of these funds are used to acquire, rehabilitate, construct, or demolish physical property.
- **The HOME Investment Partnerships Program (HOME)** provides formula grants to states and localities (used often in partnership with local nonprofit groups) to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for low-income persons.
- **Homeless – Continuum of Care (CoC)** is a body of stakeholders in a specific geographic area that plans and implements homeless assistance strategies (including the coordination of resources) to address the critical needs of homeless persons and facilitate their transition to jobs and independent living.
- **Emergency Solutions Grants (ESG)** provide formula funding to local units of government for homelessness prevention and to improve the number and quality of emergency and transitional shelters for homeless individuals and families.
- **Neighborhood Stabilization Program (NSP)** stabilizes communities that have suffered from foreclosures and abandonment. This includes providing technical assistance **(NSPTA)** as well as the purchase and redevelopment of foreclosed and abandoned homes and residential properties.
- **Housing Opportunities for People with HIV/AIDS (HOPWA)** provides education assistance and an array of housing subsidy assistance and supportive services to assist low-income families and individuals who are living with the challenges of HIV/AIDS and risks of homelessness.
- **Rural Innovation Fund (RIF)** offers grants throughout the nation to address distressed housing conditions and concentrated poverty. The grants promote an 'entrepreneurial approach' to affordable housing and economic development in rural areas by providing job training, homeownership counseling, and affordable housing to residents of rural and tribal communities.
- **Community Compass** provides technical assistance and capacity building to CPD grantees including onsite and remote training, workshops, and 1:1 assistance.

PIH ensures safe, decent, and affordable housing, creates opportunities for residents' self-sufficiency and economic independence, and assures the fiscal integrity of all program participants. HUD makes stewardship investments through the following PIH programs:

- **Indian Community Development Block Grants (ICDBG)** provide funds to Indian organizations to develop viable communities, including decent housing, a suitable living environment, and economic opportunities, principally for low and moderate-income recipients.
- The **Native Hawaiian Housing Block Grant (NHHBG)** program provides an annual block grant to the Department of Hawaiian Home Lands (DHHL) for a range of affordable housing activities to benefit low-income Native Hawaiians eligible to reside on the Hawaiian home lands. The DHHL has the authority under the NHHBG program to develop new and innovative affordable housing initiatives and programs based on local needs, including down payment and other mortgage assistance programs, transitional housing, domestic abuse shelters, and revolving loan funds.
- **Indian Housing Block Grants (IHBG)** provide funds needed to allow tribal housing organizations to maintain existing units and to begin development of new units to meet their critical long-term housing needs.
- **HOPE VI Revitalization Grants (HOPE VI)** provide support for the improvement of the living environment of public housing residents in distressed public housing units. Some investments support the acquisition, construction or rehabilitation of property owned by public housing agencies (PHAs) for state or local governments, while others help to provide education and job training to residents of the communities targeted for rehabilitation.
- **Choice Neighborhoods** grants transform distressed neighborhoods and public and assisted projects into viable and sustainable mixed-income neighborhoods by linking housing improvements with appropriate services, schools, public assets, transportation, and access to jobs.
- **The Public Housing (PH) Capital Fund** provides grants to PHAs to improve the physical conditions and to upgrade the management and operation of existing public housing.

The **OLHCHH** program seeks to eliminate childhood lead poisoning caused by lead-based paint hazards and to address other childhood diseases and injuries, such as asthma, unintentional injury, and carbon monoxide poisoning, caused by substandard housing conditions.

- **The Lead Technical Assistance Division,** in support of the Departmental Lead Hazard Control program, supports technical assistance and the conduct of technical studies and demonstrations to identify innovative methods to create lead-safe housing at reduced cost. In addition, these programs are designed to increase the awareness of lead professionals, parents, building owners, housing and public health professionals, and others with respect to lead-based paint and related property-based health issues.
- **Lead Hazard Control Grants** help state and local governments and private organizations and firms control lead-based paint hazards in low-income, privately owned rental, and owner-occupied housing. The grants build program and local capacity and generate training opportunities and contracts for low-income residents and businesses in targeted areas.

RSSI Reporting – HUD's Major Programs

Non-Federal Physical Property

Investment in Non-Federal Physical Property: Non-Federal physical property investments support the purchase, construction, or major renovation of physical property owned by state and local governments. These investments support HUD's strategic goals to increase the availability of decent, safe, and affordable housing and to strengthen communities. Through these investments, HUD serves to improve the quality of life and economic vitality. The table below summarizes material program investments in Non-Federal Physical Property, for fiscal years 2015 through 2019.

Investments in Non-Federal Physical Property
Fiscal Year 2015 – 2019
(Dollars in Millions)

Program	2015	2016	2017	2018	2019
CPD					
CDBG	$922	$996	$992	$1,068	$1,072
Disaster Grants [21]	471	466	377	371	370
HOME	18	14	10	9	14
CoC - Homeless	0	3	2	0	1
NSP [22]	1	1	0	1	0
PIH					
ICDBG [23]	$59	$57	$55	$63	$0
NHHBG	9	0	2	2	2
IHBG [24]	313	247	280	186	173
HOPE VI [25]	28	12	27	13	10
Choice Neighborhoods [26]	43	70	49	48	67
PH Capital Fund [27]	1,916	1,830	1,698	1,792	2,163
TOTAL	**$3,780**	**$3,696**	**$3,492**	**$3,553**	**$3,872**

[21] CDBG-DR has updated the data for FY 2015 through FY 2018 to ensure all grants with applicable activities are reported. The downward trend is due to an increase in housing investment and affordable housing development instead of public facilities/non-residential properties. Additionally, CDBG-DR closed six grants in FY 2017, eleven in FY 2018, and two in FY 2019.
[22] FY 2017 and FY 2019 amounts are not material to be included in the AFR.
[23] Amounts are reported under the fiscal year in which they were appropriated, not necessarily the fiscal year in which they were awarded or expended. Grants funded in FY 2019 are not yet awarded, as Office of Native American Programs is putting a 2-year NOFA through clearance.
[24] Historical amounts were updated since the last report. Amounts expended vary from year to year because annual grant amounts vary depending on funding levels, and grantees are free to expend funds on whatever activities address their current priorities.
[25] The final HOPE VI appropriation was in 2011. Except for grants awarded before 2001, all HOPE VI funds have been expended or have been canceled and returned to Treasury. Obligations will decrease each year until all HOPE VI grants have exhausted all funds.
[26] The increase in FY 2019 is due to more grantees being further into their grant and completing vertical construction. Typically, there is a lag of time of six months to a year from the time of grant award to the time that physical development can start.
[27] Positive and negative swings in Capital Fund appropriations has impacted the expenditure pattern stability in recent years. In FY 2019, the positive uptick in Capital Fund expenditures is within range and expected to occur as Capital Fund appropriations have significantly increased in recent fiscal cycles ($1 billion increase over last 5 years).

* Please refer to text box statement on page 136.

Human Capital

Investment in Human Capital: Human Capital investments support education and training programs that are intended to increase or maintain national economic productive capacity. These investments support HUD's strategic goals, which are to promote self-sufficiency and asset development of families and individuals; improve community quality of life and economic vitality; and ensure public trust in HUD. The table below summarizes material program investments in Human Capital, for fiscal years 2015 through 2019.

Investments in Human Capital
Fiscal Year 2015 – 2019
(Dollars in Millions)

Program	2015	2016	2017	2018	2019
CPD					
CDBG [28]	$25	$21	$32	$30	$34
Disaster Grants [29]	99	97	89	39	18
ESG	3	3	5	4	4
CoC - Homeless	25	16	15	14	14
HOPWA [30]	0	0	0	0	1
Community Compass	38	48	54	46	44
PIH					
IHBG	$2	$1	$8	$4	$3
HOPE VI [31]	8	5	4	1	0
Choice Neighborhoods [32]	5	12	9	12	11
TOTAL	**$205**	**$203**	**$216**	**$150**	**$129**

[28] Each CDBG grantee is responsible for selecting the activities (and level of funding) that it wishes to use CDBG funds for. Some year-to-year variation in cumulative national expenditure levels for specific categories of eligible activities is normal.
[29] In FY 2019, the methodology for reporting CDBG-DR investment in Human Capital was amended to accurately reflect the grantees' investments. In prior years, CDBG-DR reported on Technical Assistance (TA) contractors that are already reported in the RSSI under Community Compass. CDBG-DR has limited the data set to only public service activities which include services such as job training, childcare, fair housing counseling, education programs, and others. Prior reporting years included tourism funding and economic development activities which generally are not investments in Human Capital. Therefore, CDBG-DR updated its methodology to exclude these activity types which explains the significant decrease in the data reported in this report.
[30] Expenditures in FY 2015 through FY 2018 are not material to be included in the AFR.
[31] Except for grants awarded before 2001, all HOPE VI funds have been expended or have been canceled and returned to Treasury. Future expenditures will decrease until all grants have expended all funds. Expenditures in FY 2019 were not material to be included in the AFR.
[32] The decline in FY 2019 was due to the 2010/2011 cohort closing out and no longer expending human capital funds, the 2012 cohort winding down and spending less, plus the lag in new grantees getting up and running and starting to expend human capital funds.

Results of Human Capital Investments: The following table presents the results (number of people trained) of human capital investments made by HUD's CPD, PIH, and OLHCHH programs for fiscal years 2015 through 2019.

Results of Investments in Human Capital Number of People Trained Fiscal Year 2015 – 2019					
Program	**2015**	**2016**	**2017**	**2018**	**2019**
CPD					
CDBG [33]	51,808	47,805	73,922	70,253	61,444
CoC - Homeless [34]	N/A	19%	19%	18%	17%
HOPWA	1,064	502	956	669	599
NSP TA [35]	25	6	5	0	0
RIF [36]	397	0	0	0	0
Community Compass [37]	31,631	32,823	27,195	26,268	29,304
PIH					
NHHBG [38]	0	113	5	5	15
IHBG	1,756	1,752	1,812	1,403	1,470
HOPE VI (see table on pages 142 and 143)					
Choice Neighborhoods (see table on page 143)					
OLHCHH					
Lead Technical Assistance [39]	512	2,120	475	1,950	654
TOTAL	**87,193**	**85,121**	**104,370**	**100,548**	**93,486**

[33] Each CDBG grantee is responsible for selecting the activities that it wishes to use CDBG funds for, some year-to-year variation in cumulative national expenditure and accomplishments levels for specific categories of eligible activities is normal.

[34] CoC – Homeless results are expressed in terms of percentage of persons exiting the programs having employment income. This measure has a 1-year time lag. In FY 2016 through FY 2018, goals were changing, and percentages for these years have been updated, to reflect data having become available to compare each year to the prior year.

[35] All training portions of NSP were ended in FY 2017. Expenditures under investments for human capital, in FY 2015 through FY 2017, are not material to be included in the AFR.

[36] The final reporting period for the RIF program was 09/30/2015. Expenditures under investments for human capital in FY 2015 are not material to be included in the AFR.

[37] The increase in total individuals trained comes primarily in the form of persons completing online trainings; both self-paced and recorded trainings. The trainings with the highest utilization are those launched prior to FY 2019, which speaks to the quality and applicability of existing technical assistance tools, as well as efforts to better account for and catalogue existing resources before investing in new ones.

[38] A lack of S&E funding prevented ONAP from offering training in FY 2015. Grantee received training from HUD staff and, in FY 2016, from two contracted training providers. In FY *20*17 through FY 2019, ONAP focused on providing technical assistance directly to the grantee. Expenditures under investments for human capital, in FY 2016 through FY 2019, are not material to be included in the AFR.

[39] In FY 2019, OLHCHH did not host a National Healthy Homes Conference. There was only a New Grantee Orientation and a Grantee Program Mgrs. School. OLHCHH did host a National Health Homes Conference in FY 2016 and FY 2018. Expenditures under investments in human capital in FY 2015 through FY 2019 were not material to be included in the AFR.

* Please refer to text box statement on page 136.

HOPE VI/Choice Neighborhoods Results of Investments in Human Capital: Since the inception of the HOPE VI program in FY 1993, the program has made significant investments in Human Capital related initiatives (i.e., education and training). The following table, and continuation on the next page, presents HOPE VI's key performance information for fiscal years 2015 through 2019, reported as cumulative since the program's inception.

Key Results of HOPE VI Program Activities Fiscal Years 2015 – 2019						
HOPE VI Service	**2015 Enrolled**	**2015 Completed**	**% Completed**	**2016 Enrolled**	**2016 Completed**	**% Completed**
Employment Preparation, Placement & Retention [40]	87,005	N/A	N/A	87,564	N/A	N/A
Job Skills Training Programs	35,364	18,685	53%	35,675	18,877	53%
High School Equivalent Education	18,533	5,334	29%	18,705	5,381	29%
Entrepreneurship Training	3,755	1,654	44%	3,795	1,682	44%
Homeownership Counseling	16,837	7,350	44%	17,399	7,804	45%
HOPE VI Service	**2017 Enrolled**	**2017 Completed**	**% Completed**	**2018 Enrolled**	**2018 Completed**	**% Completed**
Employment Preparation, Placement & Retention [41]	87,861	N/A	N/A	87,873	N/A	N/A
Job Skills Training Programs	35,748	18,917	53%	35,749	18,920	53%
High School Equivalent Education	18,792	5,390	29%	18,795	5,393	29%
Entrepreneurship Training	3,803	1,684	44%	3,803	1,684	44%
Homeownership Counseling	17,410	7,805	45%	17,413	7,805	45%

[40] Completion data for this service is not provided, as all who enroll are considered recipients of the training.
[41] *Ibid*.

Key Results of HOPE VI Program Activities Fiscal Years 2015 – 2019 Cont'd			
HOPE VI Service	**2019 Enrolled**	**2019 Completed**	**% Completed**
Employment Preparation, Placement & Retention [42]	87,873	N/A	N/A
Job Skills Training Programs	35,749	18,922	53%
High School Equivalent Education	18,795	5,393	29%
Entrepreneurship Training	3,803	1,684	44%
Homeownership Counseling	17,415	7,806	45%

The following table presents Choice Neighborhoods' cumulative performance information for fiscal years 2015 through 2019.

Key Results of Choice Neighborhoods Program Activities Fiscal Years 2015 – 2019					
Choice Neighborhoods Service	**2015**	**2016**	**2017**	**2018**	**2019 [43]**
Current Total Original Assisted Residents	7,017	10,089	13,446	10,132	13,906
Current Total Original Assisted Residents in Case Management	3,063	4,882	7,596	6,750	9,827
High School Graduation Rate [44]	N/A	N/A	N/A	N/A	N/A
Number of Residents (in Case Management) Who Completed Job Training or Other Workforce Development Programs	867	343	119	90	99

Research and Development

Investments in Research and Development: Research and development investments support (a) the search for new knowledge and/or (b) the refinement and application of knowledge or ideas, pertaining to development of new or improved products or processes. Research and development investments are intended to increase economic productive capacity or yield other future benefits. As such, these investments support HUD's strategic goals, which are to increase the availability of decent, safe, and affordable housing in America's communities; and ensure public trust in HUD.

[42] *Ibid*.
[43] The increase in FY 2019 is due to more grantees being further into their grant cycle, having completed resident assessments, and have offered case management services to residents.
[44] Program level High School Graduation Rate data is currently not available for 2015 through 2019, due to metric only requiring individual grantees to enter rates and not numerator and denominator.

The following table summarizes HUD's research and development investments, for fiscal years 2015 through 2019.

Investments in Research and Development Fiscal Year 2015 – 2019 (Dollars in Millions)					
Program	**2015**	**2016**	**2017**	**2018**	**2019**
OLHCHH					
Lead Hazard Control	$4	$5	$6	$3	$5
TOTAL	**$4**	**$5**	**$6**	**$3**	**$5**

Results of Investments in Research and Development: In support of HUD's lead hazard control initiatives, the OLHCHH program has conducted various studies. Such studies have contributed to an overall reduction in the per-housing unit cost of lead hazard evaluation and control efforts over the last decade. More recently, as indicated in the following table, increased supply and labor costs have contributed to increases in the per-housing unit cost. The per-housing unit cost varies by geographic location and the grantees' level of participation in control activities. These studies have also led to the identification of the prevalence of related hazards.

Results of Research and Development Investments Fiscal Year 2015 – 2019 (in Dollars)					
Program	**2015**	**2016**	**2017**	**2018**	**2019**
OLHCHH					
Lead Hazard Control					
Per-Housing Unit Cost	$8,909	$9,048	$8,437	$8,046	$11,442
TOTAL	**$8,909**	**$9,048**	**$8,437**	**$8,046**	**$11,442**

Required Supplementary Information (RSI)

As discussed in this document, HUD implemented several new processes to improve its internal financial controls and its financial statement close processes, which addressed several issues previously reported by the Office of Inspector General (OIG). In some instances, the extent of HUD's improvements required the OIG to conduct additional testing procedures, which required additional time for OIG to complete its audit process. Related to GNMA, GNMA fully implemented the subledger database, but the audit process and audit procedures could not be completed in a timely manner, resulting in a qualified opinion and delayed audit report.

Required Supplementary Information
U.S. Department of Housing and Urban Development
Combining Statement Of Budgetary Resources (Unaudited)
For The Year Ended 2019
(Dollars in Millions)

	Federal Housing Administration (FHA)	Government National Mortgage Association (GNMA)	Section 8 Rental Assistance	Public and Indian Housing Loans and Grants (PIH)	Homeless Assistance Grants	Housing for the Elderly and Disabled	Community Development Block Grants (CDBG)
Budgetary Resources:							
Unobligated Balance From Prior Year Budget Authority, Net	$ 27,103	$ 17,198	$ 1,341	$ 226	$ 3,202	$ 389	$ 29,246
Appropriations (discretionary and mandatory)	1,439	-	34,489	3,493	2,636	862	7,474
Borrowing Authority (discretionary and mandatory)	-	-	-	-	-	-	-
Spending Authority from Offsetting Collections	25,232	2,541	-	-	-	188	-
Total Budgetary Resources	**$ 53,774**	**$ 19,739**	**$ 35,830**	**$ 3,719**	**$ 5,838**	**$ 1,439**	**$ 36,720**
Status of Budgetary Resources:							
New Obligations and Upward Adjustments (Total) (Note 21)	$ 2,698	$ 3,424	$ 34,720	$ 3,387	$ 2,597	$ 806	$ 5,023
Unobligated Balance, End of Year:							
Apportioned, Unexpired Accounts	84	302	1,058	307	2,519	193	29,235
Unapportioned, Unexpired Accounts	50,926	16,012	52	11	60	433	2,460
Unexpired Unobligated Balance, End of Year	**$ 51,010**	**$ 16,314**	**$ 1,110**	**$ 318**	**$ 2,579**	**$ 626**	**$ 31,695**
Expired Unobligated Balance, End of Year	$ 66	$ 1	$ -	$ 14	$ 662	$ 7	$ 2
Unobligated Balance, End of Year (Total)	**$ 51,076**	**$ 16,315**	**$ 1,110**	**$ 332**	**$ 3,241**	**$ 633**	**$ 31,697**
Total Budgetary Resources	**$ 53,774**	**$ 19,739**	**$ 35,830**	**$ 3,719**	**$ 5,838**	**$ 1,439**	**$ 36,720**
Outlays, Net:							
Outlays, Net (Total) (discretionary and mandatory)	$ (22,464)	$ 646	$ 34,546	$ 2,807	$ 2,168	$ 746	$ 5,178
Distributed Offsetting Receipts (-)	(2,180)	-	(1)	-	-	-	-
Agency Outlays, Net (discretionary and mandatory)	**$ (24,644)**	**$ 646**	**$ 34,545**	**$ 2,807**	**$ 2,168**	**$ 746**	**$ 5,178**

Required Supplementary Information
U.S. Department of Housing and Urban Development
Combining Statement Of Budgetary Resources (Unaudited)
For The Year Ended 2019
(Dollars in Millions)

	HOME	All Other	Budgetary Total	Federal Housing Administration Non-Budgetary	Government National Mortgage Association Non-Budgetary	Other Non-Budgetary Credit Reform Accounts	Total Non-Budgetary Credit Reform Accounts	Total
Budgetary Resources:								
Unobligated Balance From Prior Year Budget Authority, Net	$ 533	$ 2,305	$ 81,543	$ 30,123	$ 2,693	$ 263	$ 33,079	$ 114,622
Appropriations (discretionary and mandatory)	1,250	7,802	59,445	-	-	-	-	59,445
Borrowing Authority (discretionary and mandatory)	-	-	-	11,479	-	-	11,479	11,479
Spending Authority from Offsetting Collections	-	84	28,045	16,501	4,984	62	21,547	49,592
Total Budgetary Resources	**$ 1,783**	**$ 10,191**	**$ 169,033**	**$ 58,103**	**$ 7,677**	**$ 325**	**$ 66,105**	**$ 235,138**
Status of Budgetary Resources:								
New Obligations and Upward Adjustments (Total) (Note 21)	$ 1,516	$ 8,482	$ 62,653	$ 47,884	$ 2,777	$ 133	$ 50,794	$ 113,447
Unobligated Balance, End of Year:								
Apportioned, Unexpired Accounts	234	903	34,835	9,022	4,312	55	13,389	48,224
Unapportioned, Unexpired Accounts	6	687	70,647	1,197	588	137	1,922	72,569
Unexpired Unobligated Balance, End of Year	**$ 240**	**$ 1,590**	**$ 105,482**	**$ 10,219**	**$ 4,900**	**$ 192**	**$ 15,311**	**$ 120,793**
Expired Unobligated Balance, End of Year	$ 27	$ 119	$ 898	$ -	$ -	$ -	$ -	$ 898
Unobligated Balance, End of Year (Total)	**$ 267**	**$ 1,709**	**$ 106,380**	**$ 10,219**	**$ 4,900**	**$ 192**	**$ 15,311**	**$ 121,691**
Total Budgetary Resources	**$ 1,783**	**$ 10,191**	**$ 169,033**	**$ 58,103**	**$ 7,677**	**$ 325**	**$ 66,105**	**$ 235,138**
Outlays, Net:								
Outlays, Net (Total) (discretionary and mandatory)	$ 938	$ 7,188	$ 31,753	$ 25,610	$ (2,712)	$ 65	$ 22,963	$ 54,716
Distributed Offsetting Receipts (-)	-	(384)	(2,565)	-	-	-	-	(2,565)
Agency Outlays, Net (discretionary and mandatory)	**$ 938**	**$ 6,804**	**$ 29,188**	**$ 25,610**	**$ (2,712)**	**$ 65**	**$ 22,963**	**$ 52,151**

U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT
OFFICE OF INSPECTOR GENERAL

February 7, 2020

Memorandum

TO: Irving L. Dennis
Chief Financial Officer, F

FROM: Kilah S. White
Assistant Inspector General for Audit, GA

SUBJECT: Transmittal of OIG's Independent Auditor's Report on HUD's Fiscal Year 2019 Consolidated Financial Statement Audit

In accordance with the Chief Financial Officers Act of 1990, as amended, we are required to annually audit the consolidated financial statements of the U.S. Department of Housing and Urban Development (HUD) and the stand-alone financial statements of the Federal Housing Administration and the Government National Mortgage Administration (Ginnie Mae). Our objective was to express an opinion on the fair presentation of HUD's consolidated financial statements in accordance with U.S. generally accepted accounting principles (GAAP) applicable to the Federal Government. This report presents our independent auditor's report on HUD's fiscal year 2019 consolidated financial statements and reports on internal controls and compliance with laws, regulations, contracts, and grant agreements.

We expressed a qualified opinion on HUD's fiscal year 2019 consolidated financial statements because of the significant effects of certain unresolved audit matters, which restricted our ability to obtain sufficient, appropriate evidence about HUD's non-credit reform loans and other liabilities resulting from Ginnie Mae's guaranty asset and guaranty liability. This report contains one material weakness, three significant deficiencies, and three instances of noncompliance with applicable laws, regulations, contracts, and grant agreements.

Beginning in 2018, HUD and Ginnie Mae have made significant progress toward resolving the material weaknesses in internal controls over financial reporting that have contributed to disclaimers of opinion since 2014. Most recently, Ginnie Mae enhanced its finance architecture and built a new nonpooled assets subledger database (SLDB) to support financial accounting and reporting for its portfolio of nonpooled assets, including mortgage loans, acquired properties, and claims receivables. Before Ginnie Mae established the SLDB, it did not have an adequate system to account for this portfolio, which was the source of disclaimers of opinion for Ginnie Mae and a major contributor to disclaimers of opinion on HUD's consolidated financial statements since 2014. Ginnie Mae implemented the SLDB in

December 2018 and is using it to produce loan-level accounting that follows GAAP and Federal budgetary accounting guidance.

Further, the HUD Chief Financial Officer developed and implemented a finance transformation plan to bring the Department's financial management into a compliant state. The Office of the Chief Financial Officer continues to make concerted efforts to fully realize this plan, and the results thus far have demonstrated considerable progress.

Our fiscal year 2019 audit of Ginnie Mae and its new SLDB system was challenging and our auditors demonstrated extraordinary efforts and commitment in completing the audit procedures necessary to express an opinion over the nonpooled loan assets portfolio. Despite Ginnie Mae's progress, we were unable to conduct all of the necessary audit procedures to obtain sufficient and appropriate audit evidence that Ginnie Mae's financial statements do not include material misstatements, due to timeframes required to conduct the audit and documentation challenges encountered during the audit. We remain encouraged that these challenges will be fully resolved during the fiscal year 2020 audit.

U.S. DEPARTMENT OF

HOUSING AND URBAN DEVELOPMENT
OFFICE OF INSPECTOR GENERAL

Independent Auditor's Report[2]

To the Secretary,
U.S. Department of Housing and Urban Development:

In our audit of the fiscal year 2019 consolidated financial statements of the U.S. Department of Housing and Urban Development (HUD), we found

- That HUD's consolidated financial statements as of and for the fiscal year ended September 30, 2019, were presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles, except for the possible effects of the matters described in the Basis for Qualified Opinion paragraph.
- One material weakness and three significant deficiencies in internal control over financial reporting, based on the procedures we performed.
- Three reportable noncompliances with provisions of applicable laws, regulations, contracts, and grant agreements tested.

The following sections discuss in more detail (1) our report on the financial statements, which includes emphasis-of-matter paragraphs related to single-year presentation of the financial statements, the Government National Mortgage Association's (Ginnie Mae) modified Federal

[2] This report is supplemented by three separate reports issued by HUD's Office of Inspector General (OIG) to provide a more detailed discussion of the internal controls over financial reporting and compliance with laws, regulations, contracts, and grant agreements and to provide specific recommendations to HUD management. The findings have been included in the Internal Controls Over Financial Reporting and Compliance With Laws, Regulations, Contracts, and Grant Agreements sections of the independent auditor's report. The supplemental reports are available on the HUD OIG internet site at https://www.hudoig.gov and are entitled (1) Additional Details To Supplement Our Fiscal Year 2019 U.S. Department of Housing and Urban Development Financial Statement Audit (audit report 2020-FO-0003, issued February 7, 2020); (2) Federal Housing Administration Fiscal Years 2019 and 2018 Financial Statements Audit (audit report 2020-FO-0001, issued November 14, 2019); and (3) Government National Mortgage Association Audit of Fiscal Year 2019 Financial Statements (audit report 2020-FO-0002, issued February 7, 2020).

credit reform accounting and implementation of Federal Accounting Standards Advisory Board (FASAB) Statement of Federal Financial Accounting Standards (SFFAS) 51 – Insurance Programs, correction of errors, required supplementary information (RSI),[3] and other information included with the financial statements;[4] (2) our report on internal control over financial reporting; (3) our report on compliance with laws, regulations, contracts, and grant agreements; and (4) agency comments and our evaluation.

Report on the Financial Statements

In accordance with the Chief Financial Officers Act of 1990, as amended, we have audited HUD's consolidated financial statements. HUD's consolidated financial statements comprise the consolidated balance sheet as of September 30, 2019; the related consolidated statement of net cost, changes in net position, and combined statement of budgetary resources for the fiscal year then ended; and the related notes to the financial statements.

We conducted our audit in accordance with U.S. generally accepted auditing standards. We believe that the audit evidence we obtained is sufficient and appropriate to provide a basis for our audit opinion, except for the significant effects of certain unresolved audit matters, which restricted our ability to obtain sufficient, appropriate evidence about HUD's other non-credit reform loans and other liabilities related to Ginnie Mae's liability for loss on remaining coverage under its mortgage-backed securities (MBS) guarantee program.[5]

Management's Responsibility for the Financial Statements

HUD management is responsible for (1) the preparation and fair presentation of these financial statements in accordance with U.S. generally accepted accounting principles; (2) preparing, measuring, and presenting the RSI in accordance with U.S. generally accepted accounting principles; (3) preparing and presenting other information included in documents containing the audited financial statements and auditor's report, and ensuring the consistency of that information with the audited financial statements and the RSI; and (4) maintaining effective internal control over financial reporting, including the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the fair presentation of these consolidated financial statements based on our audit. U.S. generally accepted government auditing standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial

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[3] In its fiscal year 2019 agency financial report, HUD presents "required supplemental stewardship information" and "required supplementary information," which are included with the financial statements. The required supplemental stewardship information presents information on investments in non-Federal physical property and human capital and investments in research and development. The required supplementary information presents management's discussion and analysis and a combining statement of budgetary resources.

[4] Other information consists of information included with the financial statements, other than the RSI and the auditor's report.

[5] Part of HUD's other liabilities includes Ginnie Mae's liability for loss on remaining coverage under its MBS guarantee program. This amount is determined by subtracting Ginnie Mae's guaranty asset from its guaranty liability.

statements are free from material misstatement. We are also responsible for applying certain limited procedures to the RSI and other information included with the financial statements.

An audit of financial statements involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the auditor's assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit of financial statements also involves evaluating the appropriateness of the accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements. Our audits also included performing such other procedures as we considered necessary in the circumstances.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified audit opinion.

Basis for Qualified Opinion

During the audit of HUD's component entity, Ginnie Mae, sufficient, appropriate audit evidence on which to base an opinion could not be obtained related to (1) material asset balances for nonpooled loans and allowance for loan loss account balances, and (2) significant estimates related to guaranty asset and guaranty liability. These unresolved matters are a scope limitation in our audit work that contributes to our qualified opinion.

> Material asset balances related to other noncredit reform loans could not be fully audited. We could not audit $2.6 billion (net of allowance) in other noncredit reform loans related to Ginnie Mae's nonpooled loan assets (NPA) as of September 30, 2019. This condition occurred because Ginnie Mae's NPA accounts could not be fully audited due to documentation challenges; and, in part due to time constraints imposed by the statutory reporting deadlines. In addition, Ginnie Mae made various restatement adjustments and correction of errors to these accounts which we were not notified about until October 2019. The late notification of the restatements toward the latter part of the audit limited our ability to adequately review them and gather sufficient, appropriate evidence to validate the accuracy and propriety of these accounting adjustments.

> Modeling concerns impacting guaranty asset, guaranty liability, and allowance for loan loss estimates. Our audit work noted significant modeling concerns affecting Ginnie Mae's guaranty asset and guaranty liability, which are netted and consolidated into HUD's other liabilities financial statement line item totaling $977 million.[6] These concerns also affected the allowance for loan loss estimates, totaling $144 million, related to Ginnie Mae's mortgage loans held for investment which are consolidated into HUD's

[6] $972 million for liability for loss on remaining coverage under SFFAS 51 – Insurance programs and $5 million for related liabilities recorded under account 2990 – Other Liabilities without related budgetary obligations.

other noncredit reform loans financial statement line item. We were unable to complete our planned audit work due to time constraints imposed by the statutory reporting deadlines. The modeling concerns relate to appropriateness and reasonableness of the model methodologies, specifications, and model assumptions used in various models, which raised questions about the reliability of the accounting estimates produced by the Ginnie Mae models.

When evaluating these areas and their impacts on HUD's consolidated financial statements as a whole, we determined that material financial statement line items were impacted and the possible effects of undetected misstatements in these areas could be material but not pervasive to HUD's fiscal year 2019 consolidated financial statements. There were no other satisfactory audit procedures that we could adopt to obtain sufficient, appropriate evidence or we were unable to complete other audit procedures within the statutory timeframes required with respect to these matters. This determination impacted the following areas reported on HUD's consolidated financial statements: (1) other noncredit reform loans totaling $2.3 billion, net of allowance; (2) $977 million in other liabilities; (3) $213 million in elimination from the Federal Housing Administration's (FHA) loan guarantee liability; (4) $52.6 million in accounts receivable; and (5) note 8, note 15, and note 25 to HUD's consolidated financial statements. These areas also impacted HUD's statement of net costs and its statement of changes in net position. Readers are cautioned that amounts reported in the consolidated financial statements and related notes impacted by these areas may not be reliable.

Qualified Opinion

We have audited the financial statements of HUD, which comprise the consolidated balance sheet as of September 30, 2019, and the related consolidated statement of net costs, changes in net position, combined statement of budgetary resources, and related note disclosures for the fiscal year then ended in accordance with U.S. generally accepted accounting principles.

In our opinion, except for the possible effects of the matters described in the Basis for Qualified Opinion section, the accompanying consolidated financial statements present fairly, in all material respects HUD's financial position as of September 30, 2019, and its net cost of operations, changes in net position, and budgetary resources for the fiscal year then ended in accordance with U.S. generally accepted accounting principles. Accordingly, we express a qualified opinion on HUD's consolidated financial statements.

Emphasis of Matter

The following are matters that we draw users' attention to that are presented or disclosed in the financial statements, which we believe are of such importance that it is fundamental to users' understanding of these financial statements.

Single-Year Presentation of Ginnie Mae Financial Statements

We were engaged to audit HUD's fiscal year 2019 financial statements and not the prior-year financial statements. Therefore, HUD presented single-year financial statements for fiscal year 2019 activity and did not present comparative statements. This independent auditor's report's scope is related to only HUD's fiscal year 2019 financial statements.

Modified Federal Credit Reform Accounting and SFFAS 51 Implementation
As discussed in note 1 to the financial statements, although Ginnie Mae's MBS guarantee program does not follow the Federal Credit Reform Act, it uses a program, financing, liquidating, and capital reserve account to process its cash receipts and disbursements through the U.S Department of the Treasury. Ginnie Mae established this fund structure at the direction of OMB in 2012. Under this structure, OMB also instructed Ginnie Mae to annually record an upward or downward reestimate and negative subsidy payment for budgetary purposes only. Based on these estimates, Ginnie Mae transfers money between its accounts. These transfers are reflected in the spending authority from offsetting collections and new obligations and upward adjustments financial statement line items on the statement of budgetary resources and impact the amount held in fund balance with Treasury versus investments on the balance sheet. Therefore, although HUD accounts for Ginnie Mae's MBS guarantee program in accordance with SFFAS 51, it also performs a modified credit reform accounting at the direction of OMB.

Correction of Errors in HUD's Fiscal Year 2019 Financial Statements
As discussed in note 1 to the financial statements, HUD corrected its 2019 beginning balances to correct the following errors: (1) incorrect classification of the Rental Assistance Demonstration Program (RAD) conversion funds under the Section 8 program as funds from dedicated collections instead of all other funds, (2) incorrect recognition of Indian Housing Block Grant disbursements used for investment as expenses instead of advances, (3) abnormal balances that resulted from incorrect posting logic, (4) differences between the subledger and general ledger, and (5) incorrect subsidy expense for loan guarantees due to erroneous postings of Section 108 upfront fees to the account for the subsidy expense fee component.

HUD's component entity, Ginnie Mae, also performed two sets of restatements to its fiscal year 2018 financial statements, which were consolidated into HUD's financial statements as corrections of errors. These corrections were due to (1) the implementation of a subledger database and new accounting policies to account for NPA portfolio balances, presented as other noncredit reform loans on HUD's balance sheet in compliance with GAAP requirements, and (2) errors identified by Ginnie Mae internal controls due to erroneous data inputs, incorrect formulas, and incorrect information used to determine various NPA balances.

HUD also changed its accounting principles to account for Ginnie Mae's MBS guarantee program and HUD's internal use software. In fiscal year 2019, Ginnie Mae began accounting for its MBS program as an insurance program as defined in SFFAS 51 – Insurance Programs. SFFAS 51 became effective for all agencies beginning in fiscal year 2019. HUD also used the accounting principles of SFFAS 48 and 50 to establish an opening balance for internal use software as part of HUDs' general property, plant, and equipment.

Our opinion was not modified with respect to these matters in fiscal year 2019.

Other Matters

The following are other matters that are relevant to the users' understanding of the audit we conducted of HUD's consolidated financial statements, our responsibilities as the auditor, and our audit report included herein.

Required Supplementary Information

U.S. generally accepted accounting principles issued by FASAB require that the RSI be presented to supplement the financial statements. Although the RSI is not a part of the financial statements, FASAB considers this information to be an essential part of financial reporting for placing the financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the RSI in accordance with U.S. generally accepted government auditing standards, which consisted of inquiries of management about the methods of preparing the RSI and comparing the information for consistency with management's responses to the auditor's inquiries, the financial statements, and other knowledge we obtained during the audit of the financial statements, in order to report omissions or material departures from FASAB guidelines, if any, identified by these limited procedures. We did not audit and we do not express an opinion or provide any assurance on the RSI because the limited procedures we applied do not provide sufficient evidence to express an opinion or provide any assurance.

Other Information

HUD's other information contains a wide range of information, some of which is not directly related to the financial statements. This information is presented for purposes of additional analysis and is not a required part of the financial statements or the RSI. We read the other information included with the financial statements in order to identify material inconsistencies, if any, with the audited financial statements. Our audit was conducted for the purpose of forming an opinion on HUD's financial statements. We did not audit and do not express an opinion or provide any assurance on the other information.

Report on Internal Controls Over Financial Reporting

In connection with our audit of HUD's consolidated financial statements, we considered HUD's internal control over financial reporting, consistent with our auditor's responsibility discussed below. We performed our procedures related to HUD's internal control over financial reporting in accordance with U.S. generally accepted government auditing standards.

Management's Responsibility

HUD management is responsible for maintaining effective internal control over financial reporting, including the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

In planning and performing our audit of HUD's consolidated financial statements as of and for the year ended September 30, 2019, in accordance with U.S. generally accepted government auditing standards, we considered HUD's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of HUD's internal control over financial reporting. Accordingly, we do not express an opinion on HUD's internal control over financial reporting. We are required to report all deficiencies that are considered to be significant deficiencies[7] or material weaknesses.[8] We did not consider all internal controls relevant to operating objectives, such as those controls relevant to preparing performance information and ensuring efficient operations.

Definition and Inherent Limitations of Internal Control Over Financial Reporting
An entity's internal control over financial reporting is a process effected by those charged with governance, management, and other personnel, the objectives of which are to provide reasonable assurance that (1) transactions are properly recorded, processed, and summarized to permit the preparation of financial statements in accordance with U.S. generally accepted accounting principles and assets are safeguarded against loss from unauthorized acquisition, use, or disposition and (2) transactions are executed in accordance with provisions of applicable laws, including those governing the use of budget authority, regulations, contracts, and grant agreements, noncompliance with which could have a material effect on the financial statements.

Because of its inherent limitations, internal control over financial reporting may not prevent or detect and correct misstatements due to fraud or error.

Results of Our Consideration of Internal Control Over Financial Reporting
Our consideration of internal control was for the limited purpose described above and was not designed to identify all deficiencies in internal control that might be material weaknesses and significant deficiencies or to express an opinion on the effectiveness of HUD's internal control over financial reporting. Given these limitations, other deficiencies in internal control that might be material weaknesses or significant deficiencies may exist that have not been identified.

During our fiscal year 2019 audit, we identified four deficiencies in HUD's internal control over financial reporting, one of which we classified as a material weakness and three of which we considered to be significant deficiencies. We have communicated these matters and have reported them in separate audit reports to HUD management.[9] These separate audit reports contain details regarding HUD's, FHA's, and Ginnie Mae's internal controls over financial reporting and augment the discussions of instances in which HUD did not comply with applicable laws, regulations, contracts, and grant agreements.

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[7] A significant deficiency is a deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

[8] A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented or detected and corrected on a timely basis.

[9] Audit Report 2020-FO-0003, Additional Details To Supplement Our Fiscal Year 2019 U.S. Department of Housing and Urban Development Financial Statement Audit, issued February 7, 2020; Audit Report 2020-FO-0001, Federal Housing Administration Fiscal Years 2019 and 2018 Financial Statements Audit, issued November 14, 2019; Audit Report 2020-FO-0002, Government National Mortgage Association Audit of Fiscal Year 2019 Financial Statements, issued February 7, 2020

Material Weakness

1. HUD did not always comply with GAAP, significant estimates were not reliable, and adequate support for material asset balances could not be provided in time to be audited.
    a. HUD did not properly account for or have adequate accounting support for all of its assets, liabilities, and budgetary resources. Specifically, HUD did not (1) use an appropriate method to commit and disburse fiscal year 2014 and prior obligations for the Office of Community Planning and Development's (CPD) formula grant programs; (2) adequately validate CPD's accrued grant liability estimate; (3) use complete and accurate data to estimate the Office of Public and Indian Housing's (PIH) prepayment balance; (4) recognize all financial events resulting from PIH's cash management process; (5) ensure the completeness of or accurately report on accounts receivable; or (6) properly account for property, plant, and equipment. These deficiencies occurred because of continued weaknesses in HUD's internal controls and insufficient financial management controls and systems. As a result, several financial statement line items were misstated or at risk of material misstatement as of September 30, 2019.

    b. Ginnie Mae's accounting estimates for guaranty asset, guaranty liability, and mortgage loans held for investment allowance for losses could not be audited. We identified significant concerns regarding the reliability of these material accounting estimates. In addition, we encountered supporting documentation challenges when testing the validity and accuracy of claims receivable and reimbursable costs receivable which prevented us from completing our audit work. These conditions occurred due to weaknesses in Ginnie Mae's financial management governance, including estimation model governance, and weaknesses in internal controls. Further, these accounts could potentially have undetected misstatements that could be material and pervasive. For mortgage loans held for investment and acquired property, we could not complete our audit of these accounts, partly due to the impact of late notification of restatement adjustments and corrections of errors, and timing of the receipt of the yearend data that we needed to complete our yearend balances testwork to meet statutory timeframes. Therefore, we were unable to express an opinion on Ginnie Mae's $2.6 billion in NPA and related accounts and the $7.1 billion and $8.1 billion in guarantee asset and guarantee liability respectively, as of September 30, 2019.

Significant Deficiencies

1. There were HUD-wide weaknesses in internal controls over financial reporting (HUD, FHA, and Ginnie Mae). Our audits of the HUD consolidated, FHA, and Ginnie Mae financial statements identified weaknesses in internal controls over financial reporting. While some of the weaknesses identified were specific to HUD, and FHA and Ginnie Mae component financial reporting processes, the impact of the component-level weaknesses also impacted the completeness and accuracy of HUD's financial reporting

process when consolidating component-entity financial information to prepare HUD's consolidated financial statements and accompanying notes.

- HUD financial reporting. In fiscal year 2019, HUD continued to significantly improve the accuracy and completeness of its financial reporting; however, we still noted errors in its interim financial statements and notes. Specifically, HUD (1) incorrectly classified RAD as funds from dedicated collections in its first and second quarter fiscal year 2019 financial statements and (2) reported an incomplete Note 25 – Insurance Programs in its third quarter financial statements. We attributed these conditions to limitations in HUD's financial reporting controls. As a result, HUD's quarterly consolidated financial statements were misstated, and without our review, HUD's yearend financial statements would have been misstated and not fully compliant with GAAP or OMB Circular A-136.

- FHA financial reporting. During the fiscal year 2019 audit, we identified control deficiencies in financial reporting, and some control deficiencies reported in prior fiscal years remained. The new control deficiencies identified this fiscal year were related to the insufficient research and model documentation for a key assumption in the home equity conversion mortgage (HECM) model, improper recording of refunds for the single-family and HECM programs, and errors in reporting the HECM insurance-in-force and the reestimates in the financial statement note disclosures. These conditions occurred because FHA did not properly research and concurrently document its rationale for a decision on a key HECM model assumption, properly design its posting models, and have effective processes in place to ensure that data reported in the financial statement note disclosures were properly presented and reported. As a result, the loan guarantee liability was potentially overstated by approximately $309.1 million, and obligations, outlays, and collections were understated by $81.8 million in FHA's general ledger at the end of fiscal year 2019.

  Also, as in prior years, FHA continued to face challenges in deobligating invalid obligations in a timely manner and may have missed an opportunity to put $55.4 million to better use in fiscal year 2019 because it did not deobligate invalid obligations. Further, FHA had not addressed the weaknesses in processing recorded HECM assignments that we identified during our fiscal year 2018 audit.

- Ginnie Mae financial reporting. Ginnie Mae continued to make progress in strengthening internal control over financial reporting during fiscal year 2019. However, we identified deficiencies that demonstrated weaknesses in certain internal controls over financial reporting. Specifically, Ginnie Mae (1) was unable to provide assurance on the effectiveness of its internal controls, (2) had control weaknesses regarding its nonpooled loan assets, and (3) had weaknesses in its data processing controls within its nonpooled assets audit remediation (NPAAR)[10] solution. These conditions occurred because Ginnie Mae (1) did not complete necessary OMB Circular A-123 testing, (2) lacked sufficient communication and coordination with its mastersubservicers[11] during the planning and development phase of its subledger database (SLDB), (3) relied on detective controls to validate data from the Office of Enterprise Risk (OER) to SLDB rather than preventive controls, and (4) deferred a significant number of programming code corrections and enhancements. As a result, Ginnie Mae's loan-level data contained errors that were corrected through (1) manual adjustments in fiscal year 2019 totaling $219 million, and (2) restatement of its fiscal year 2018 financial statements by an absolute value of $65.4 million in assets and liabilities and net impact of $19.6 million in its investment in the U.S. Government. These corrections impacted the September 30, 2019, balances of all 23,476 active loans in its NPA portfolio. Until remaining weaknesses are resolved, Ginnie Mae cannot provide assurance that its internal controls can be relied on to prevent and correct misstatements or the risk of material misstatements in its financial statements in a timely manner.

2. <u>Despite progress, HUD's financial management system and computing environment weaknesses continued.</u> While HUD continued to make progress in its multiyear effort to address financial management system weaknesses and limitations during fiscal year 2019, challenges remained. These challenges remained due to a continued lack of key functionality and critical financial systems to meet financial management needs. Additionally, HUD did not ensure that controls over its computing environment fully complied with HUD policy and Federal guidance. Specifically, we identified weaknesses related to HUD's IBM mainframe general support system and the New Core Interface Solution as well as deficiencies in application-level general and data management system controls in Ginnie Mae's Financial Accounting System and subledger database. As a result of the shortcomings in HUD's financial management systems, we continued to report on weaknesses in HUD's financial reporting, which increased the risk of a misstatement on HUD's financial statements, as discussed in this audit report. Further, without adequate controls over its computing environment, (1) HUD lacked assurance that financial management applications and the data within them would be adequately protected and (2) was not in full compliance with Federal information system controls requirements for certain systems.

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[10] Ginnie Mae developed a new nonpooled assets (NPA) SLDB to support financial accounting and reporting. The new NPA SLDB is used to produce loan-level accounting following GAAP and Federal budgetary accounting guidance. Its output feeds into Ginnie Mae's general ledger and financial statements. The NPA audit remediation solution is commonly referred to as NPAAR.

[11] Ginnie Mae engages mastersubservicers to perform servicing responsibilities for its pooled and nonpooled loan portfolios. As part of these activities, the mastersubservicers routinely request advances from Ginnie Mae for shortfalls in borrower taxes and insurance payments and other costs. In August 2014, Ginnie Mae transferred servicing responsibilities to different servicing entities, referred to as the current mastersubservicers.

3. HUD financial management governance had progressed, but financial management processes had not fully matured. During fiscal year 2019, HUD experienced progress with its financial management governance; however, several areas remained unaddressed or require further improvements to fully address weaknesses and reach maturity of financial management processes. Specifically, as of September 30, 2019, (1) risk mitigation responsibilities for enterprise risk management were not assigned, (2) organizational assessments found weaknesses with financial management and internal control, (3) management reviews and assessments were not performed, and (4) program offices did not implement internal controls, including funds control, for key operations. Weaknesses in program and component internal controls, which impacted financial reporting, developed, in part due to a lack of fully matured financial management processes. These financial management maturity weaknesses contributed considerably to the (1) significant deficiencies in internal controls over financial reporting; (2) instances of noncompliance with laws, regulations, contracts, and grant agreements; and (3) consecutive years of identifying and recording correction of errors that impacted prior-year balances. Further, these weaknesses allowed for identified risks to continue and not be managed. While financial management leadership continued to provide direction and priorities to ensure proper oversight and implementation of robust financial management practices, HUD continued to experience challenges in significant areas, indicative of HUD's need for continued growth toward financial management maturity.

Intended Purpose of Report on Internal Control Over Financial Reporting

The purpose of this report is solely to describe the scope of our consideration of HUD's internal control over financial reporting and the results of our procedures, and not to provide an opinion on the effectiveness of HUD's internal control over financial reporting. This report is an integral part of an audit performed in accordance with U.S. generally accepted government auditing standards in considering internal control over financial reporting. Accordingly, this report on internal control over financial reporting is not suitable for any other purpose. In addition to separate reports detailing the internal control issues included in this report and providing specific recommendations to HUD management, we noted other matters involving internal control over financial reporting and HUD's operations that we are reporting to HUD management in a separate management letter.

Report on Compliance With Laws, Regulations, Contracts, and Grant Agreements

In connection with our audit of HUD's consolidated financial statements, we tested compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements consistent with our auditor's responsibility discussed below. We caution that noncompliance may occur and not be detected by these tests. We performed our tests of compliance in accordance with U.S. generally accepted government auditing standards.

Management's Responsibility

HUD's management is responsible for complying with laws, regulations, contracts, and grant agreements applicable to HUD.

Auditor's Responsibility

Our responsibility is to test compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements applicable to HUD that have a direct effect on the determination of material amounts and disclosures in HUD's consolidated financial statements and perform certain other limited procedures. Accordingly, we did not test compliance with all laws, regulations, contracts, and grant agreements applicable to HUD.

Results of Our Tests for Compliance With Laws, Regulations, Contracts, and Grant Agreements

Our tests for compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements disclosed three instances of noncompliance for fiscal year 2019 that would be reportable under U.S. generally accepted government auditing standards. However, the objective of our tests was not to provide an opinion on compliance with laws, regulations, contracts, and grant agreements applicable to HUD. Accordingly, we do not express such an opinion.

1. HUD's financial management system did not comply with the Federal Financial Management Improvement Act. HUD's FFMIA noncompliance continued in fiscal year 2019. We noted a number of instances of FFMIA noncompliance within HUD's financial management system. HUD's continued noncompliance was due to ineffectively designed and operating key internal controls over financial reporting and unimplemented recommendations from longstanding issues related to component and program offices' system weaknesses.

2. HUD and Ginnie Mae did not comply with the Debt Collection Improvement Act. HUD did not comply with the Debt Collection Improvement Act (DCIA) as amended. HUD had 81 sustained audit receivables,[12] dating back to 2006, for which it had not established a repayment agreement or received reasonable collections. Without repayment agreements, HUD could not determine whether these receivables were in delinquent status, nor could it maximize collection efforts. In addition, HUD did not have reasonable assurance that its accounts receivable records included all debts owed to it. Similar to the lack of repayment agreements and collections, without assurance that it had recorded all debts owed to it, HUD could not ensure that it serviced and took necessary steps to collect all debts. We attributed these conditions to weaknesses in HUD's management system for debt collection, as the Office of the Chief Financial Officer's debt collection efforts had not led to an effective system for identifying and servicing debts or maximizing collections. As a result, HUD was hampered in its ability to comply with DCIA and to recoup money owed to it that could have been used to serve the public.

   Ginnie Mae also continued its noncompliance with the Act in fiscal year 2019. As reported in the past 4 fiscal years, Ginnie Mae continued its practice of not analyzing the possibility of collecting on certain uninsured mortgage debts owed to Ginnie Mae, using all debt collection tools allowed by law, before discharging them. This condition occurred because Ginnie Mae continued to take the position that DCIA did not apply to it; therefore, it did not need to comply with DCIA requirements. Thus, HUD's and

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[12] Sustained audit receivables are receivables that result from HUD OIG audits.

Ginnie Mae's noncompliance with the Act continued, and as a result, they were unable to recoup funds due them that could be used to serve the public.

3. HUD did not always comply with the Improper Payments Elimination and Recovery Act of 2010. A HUD Office of Inspector General (OIG) audit[13] found that fiscal year 2018 marked the sixth consecutive year in which HUD did not always comply with the Improper Payments Elimination and Recovery Act of 2010 (IPERA). Specifically, it did not always (1) publish improper payment estimates for all required programs and (2) report an improper payment rate of less than 10 percent. These conditions occurred because HUD was continuing to revamp its program to address prior-year IPERA compliance issues. Until all of the prior- and current-year IPERA issues have been remediated, HUD will likely continue to miss opportunities to prevent, identify, reduce, and recover improper payments.

Intended Purpose of Report on Compliance With Laws, Regulations, Contracts, and Grant Agreements

The purpose of this report is solely to describe the scope of our testing of compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements and the results of that testing and not to provide an opinion on compliance. This report is an integral part of an audit performed in accordance with U.S. generally accepted government auditing standards in considering compliance. Accordingly, this report on compliance with laws, regulations, contracts, and grant agreements is not suitable for any other purpose.

Results of the Audit of FHA's Financial Statements

We performed a separate audit of FHA's fiscal years 2019 and 2018 financial statements. Our report on FHA's financial statements[14] includes an unmodified opinion on FHA's financial statements, along with discussion of one significant deficiency in internal controls.

Results of the Audit of Ginnie Mae's Financial Statements

We performed a separate audit of Ginnie Mae's fiscal year 2019 financial statements. Our report on Ginnie Mae's financial statements[15] includes a disclaimer of opinion on these financial statements, along with discussion of two material weaknesses; one significant deficiency in internal control; and one instance of noncompliance with laws, regulations, and contracts.

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[13] Audit Report 2019-AT-0001, Compliance With the Improper Payments Elimination and Recovery Act, issued June 3, 2019.

[14] Audit Report 2020-FO-0001, Federal Housing Administration Fiscal Years 2019 and 2018 Financial Statements Audit, issued November 14, 2019.

[15] Audit Report 2020-FO-0002, Government National Mortgage Association Audit of Fiscal Year 2019 Financial Statements, issued February 7, 2020.

Auditee Comments and Our Evaluation

HUD’s Chief Financial Officer (CFO) provided a response to our draft independent auditor’s report on January 31, 2020, which can be found in its entirety, along with our evaluation, in appendix A.

The CFO recognized that, overall, the report demonstrates considerable improvements in HUD’s financial management and reporting processes when compared to prior years. However, the CFO did not agree with the way certain conclusions and characterizations were presented in this report.

We will work with HUD during the audit resolution process as HUD develops and implements corrective action plans to address these findings. We look forward to working with HUD through its finance transformation efforts to advance HUD’s financial management maturity.

Kimberly R. Randall
Deputy Assistant Inspector General for Audit
Washington, DC

February 7, 2020

Appendixes

Appendix A

Auditee Comments to Independent Auditor's Report

Ref to OIG Evaluation

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

CHIEF FINANCIAL OFFICER

HUD OCFO MEMO 20-21

MEMORANDUM FOR: Rae Oliver Davis, Inspector General, HUD, GAF

FROM: Irving L. Dennis, Chief Financial Officer, HUD, F

1/31/2020

SUBJECT: Response to Fiscal Year 2019 Financial Statement Audit – Transmittal of Draft Fiscal Year 2019 Independent Auditor's Report On HUD's Fiscal Year 2019 Financial Statements

Comment 1

HUD continues to be committed to fulfilling its mission to create strong, sustainable, inclusive communities and quality affordable homes for American families and individuals. We are also committed to building strong processes to protect tax payor funds from fraud, waste and abuse. The work of HUD's Office of Inspector General (OIG) helps to ensure that HUD programs and employees work to successfully accomplish these goals.

Through our finance transformation efforts, we are overcoming several historical challenges. We have built strong and robust governance practices, made significant improvement in our internal controls and financial policies, improved our operations, leveraged intelligent automation, and built a strong foundation to continue towards financial excellence.

Comment 2

While, in my professional opinion as a CPA and former audit partner, I may not agree with certain conclusions, and characterizations, in the audit opinion related to the Office of Inspector General's ("OIG") inability to obtain audit evidence for GNMA's fully implemented processes and controls related to non-pooled loans and related balances, I do appreciate that the Independent Audit Report recognizes the significant improvements made in our financial controls over the last two years.

Comment 3

My office also acknowledges the importance of the audit process in our finance transformation efforts and we will continue to work jointly with the OIG to address and improve the way we do business. Our business process improvements will be driven by our assessment of materiality and will pursue meaningful changes based on allocated resources. Our focus will be on improving internal controls throughout the department, continuing to enable the remediation of HUD's weaknesses, and using intelligent automation to allow our employees to work more efficiently and effectively for high risk areas.

Through the efforts of the Office of the Chief Financial Officer's Financial Transformation plan, including robust governance, HUD will continue to make progress and fully restore sound financial management and stability throughout the department. The entire HUD team is committed to serving America's communities in everything that we do. It is our goal to do so in the most effective and efficient way possible—and we look forward to working with the OIG to make our working relationship productive and valuable to the American taxpayer.

OIG Evaluation of Auditee Comments

Comments 1 We recognize the progress that HUD, particularly the current Office of the Chief Financial Officer (OCFO), has made in the development and implementation of a finance transformation plan to advance the Department's financial management maturity and to bring it into a compliant state. The OCFO continues to make concerted efforts to fully realize this plan, and the results thus far have demonstrated considerable progress.

Comment 2 The HUD Chief Financial Officer recognized that, overall, the report demonstrates considerable improvements in HUD's financial management and reporting processes when compared to prior years. However, the CFO did not agree with the way certain conclusions and characterizations were presented in this report.

During fiscal year 2019, Ginnie Mae implemented a subledger database, business processes, and internal controls related to its portfolio of nonpooled loan assets and related balances. However, as discussed in the audit report, we were unable to conduct all of the necessary audit procedures to obtain sufficient and appropriate audit evidence that Ginnie Mae's financial statements do not include material misstatements, due to timeframes required to conduct the audit and documentation challenges encountered during the audit.

Comment 3 We remain encouraged that remaining challenges affecting HUD's financial reporting will be resolved during the fiscal year 2020 audit. We look forward to working with HUD as it strives to address our findings and as it continues its finance transformation efforts to advance HUD's financial management maturity.

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Other Information

Table of Contents

U.S. Department of Housing and Urban Development

OFFICE OF INSPECTOR GENERAL

Top Management Challenges

Facing the U.S. Department of Housing and Urban Development in 2020 and Beyond

Memorandum

Date: October 18, 2019

Subject: Management and Performance Challenges for Fiscal Year 2020 and Beyond

From: Rae Oliver Davis
Inspector General, G

To: Dr. Benjamin Carson, Sr.
Secretary, S

Each year, in compliance with Public Law 106-531, the Reports Consolidation Act of 2000, the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General (OIG), issues a report summarizing what we consider the most serious management challenges facing the Department. In turn, HUD is required to include this report in its annual agency financial report. This report represents HUD OIG's perspective on the top management challenges facing HUD in fiscal year 2020.

HUD's top management challenges result from critical unaddressed internal or external risks, either longstanding or recently emerged. They represent HUD's greatest vulnerabilities to waste, fraud, abuse, and mismanagement or pose significant risk to HUD's ability to accomplish its mission. In developing this report, we considered the issues affecting HUD and applied our own judgment. We have continued to use the framework adopted last year after concluding that most of the challenges identified in 2019 are ongoing. We have added two new challenges – human capital and ethical conduct – based on the broad impact these challenges have on HUD's ability to accomplish its mission across programs and operations.

We have identified top management challenge within the following eight broad categories:

1. HUD's Human Capital – Fewer Employees, Significant Reliance on Contracted Services.
2. Ensuring the Availability of Affordable Housing That Is Decent, Safe, Sanitary, and in Good Repair.
3. Protecting the Mortgage Insurance Programs.
4. Providing Adequate Monitoring and Oversight of Its Operations and Program Participants.
5. Administering Disaster Recovery Assistance.

6. Modernizing Technology and the Management and Oversight of Information Technology.
7. Instituting Sound Financial Management.
8. Ensuring Ethical Conduct.

Within each of these categories, we have identified specific programs and practices, which represent critical risk to HUD's ability to meet the needs of its beneficiaries and protect taxpayer dollars. We have also identified HUD's progress, where applicable, to begin to address these challenges. We look forward to working with HUD to address these critical areas for improvement.

Contents

TOP MANAGEMENT CHALLENGE

1

HUD's Human Capital—Fewer Employees, Significant Reliance on Contracted Services

- HUD Struggles To Maintain a Qualified Federal Workforce
- HUD Relies on Contractors To Conduct Its Mission

The U.S. Department of Housing and Urban Development's (HUD) accomplishment of its mission has been challenged by a steady decline in staffing and related reliance on third parties to operate, implement, and monitor HUD programs. As of May 2019, HUD had 7,306 employees, nearly 30 percent fewer than it had 20 years ago. HUD predicts that by fiscal year 2020, 57 percent of its employees will be retirement eligible.[1] At the same time, HUD's overall footprint in lending and grant programs has increased and with this, its responsibilities to manage this portfolio of programs. Examples include Federal Housing Administration (FHA) and Government National Mortgage Association (Ginnie Mae) support to the U.S. residential lending system during the financial crisis[2] and new and burgeoning programs to support America's aging population, including home equity conversion mortgages (HECM)[3] and the Section 232 program[4] (which insures mortgages on residential care facilities). HUD also faces an aging rental housing portfolio and increasing demand for affordable housing. Finally HUD, as a key source of disaster recovery funds, has administered $83.7 billion in funding since 2001, of which $35.8 billion has been appropriated since 2017.

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[1] HUD Strategic Workforce Plan 2018-22, issued June 28, 2018, p. 10

[2] As of August 2019, FHA's insured loan balance was almost $1.5 trillion, and Ginnie Mae's insured securities approached $2.087 trillion.

[3] As of 2018, FHA had insured more than one million HECM loans, of which approximately 551,000 are still active. See the U.S. Government Accountability Office (GAO) report, Reverse Mortgages, HUD Needs to Improve Monitoring and Oversight of Loan Outcomes and Servicing, GAO-19-702 (September 2019).

[4] The 232 program has also grown substantially. As of March 2018, HUD insured 2,458 loans with a principal balance exceeding $19.6 billion (Audit Report 2018-BO-0001, HUD's Monitoring of the Financial Performance of Section 232 Nursing Homes, issued September 17, 2018).

HUD has been challenged to adjust its workforce to these changes and to seek other avenues for meeting its human capital needs, primarily through contracts. The impacts of these challenges contribute to many of the other management challenges discussed in this report.

HUD Struggles To Maintain a Qualified Federal Workforce

By HUD's own assessment, its top enterprise risks include the hiring and retention of qualified staff, the justification of staffing levels and reassignments, and staff training and skills gaps.

A key issue is attracting and hiring qualified staff. Over the past 2 years, the Office of Inspector General (OIG) has expressed concerns about HUD's inability to retain leadership and supporting staff in certain key positions. Over the last year, HUD's Federal staff has continued to decrease by the hundreds, and the lack of staff in key management positions has affected a number of HUD offices. A review of HUD's staff directories indicates the scope of the problem. The Office of Housing, HUD's largest office, is led by an Assistant Secretary who also acts as HUD's Deputy Secretary. The current Deputy Assistant Secretary in Housing is also acting, and nearly a quarter of the management positions in Housing are either vacant or filled by acting staff.[5] The Office of Administration lacks an Assistant Secretary, one of the two deputies is acting, and approximately one quarter of the Office of the Chief Human Capital Officer's management positions are either vacant or held by acting staff.[6] In the Office of Public and Indian Housing (PIH), a quarter of the management positions are either vacant or held by acting staff. In the Office of the Chief Information Officer (OCIO), approximately half of the key positions are either vacant or held by acting staff.[7] And in the Office of Fair Housing and Equal Opportunity, nearly two-thirds of the field management positions are either vacant or held by acting staff.[8]

HUD's hiring processes take longer than the Federal standard of 80 days, with HUD reporting its average time to hire as 113 days in fiscal year 2018, resulting in a deficiency in hiring needed staff, even when funds are available.

Specifically, a March 2019 U.S. Government Accountability Office (GAO) report examined HUD staffing for its Community Development Block Grant Disaster Recovery (CDBG-DR) program and noted that despite significant increases in appropriations for disaster relief, the program's number of staff members had increased at a significantly slower rate.[9] HUD officials reported an intent to hire some 20 new staff members with

[5] Office of Housing Directory, https://www.hud.gov/program_offices/housing/dirhousi
[6] The Office of the Chief Human Capital Officer's Key Staff Directory, https://www.hud.gov/program_offices/administration/about/ochcodir
[7] Chief Information Officer Functional Points of Contact, https://www.hud.gov/program_offices/cio/dircio
[8] Who's Who in FHEO [Office of Fair Housing and Equal Opportunity], https://www.hud.gov/program_offices/fair_housing_equal_opp/fheodir
[9] GAO report, Disaster Recovery, Better Monitoring of Block Grant Funds is Needed, GAO-19-232 (March 2019)

approved funding in fiscal years 2018 and 2019; however, as of August 2019, HUD had not hired any additional staff.

HUD has made progress in filling senior positions, notably in the hiring of a Chief Financial Officer (CFO). The CFO is making strides to address the Department's longstanding financial governance issues. In addition, HUD's Strategic Plan and its Integrity Taskforce are focusing on improving HUD's hiring process, with goals that include shortening the hiring timeframe, expanding avenues for hiring, and improving data resources. HUD's fiscal year 2018 Performance Plan notes that it has reduced its hiring timeline by several days. Additionally, HUD's hiring performance may improve due to congressional action in fiscal year 2019, which authorized HUD to annually spend salaries and expenses over a 2-year period.

HUD also faces challenges in its workforce and strategic planning. The same issues HUD referenced as enterprise risks were identified by GAO in multiple reports dating back to 2013. GAO noted that while HUD has historically responded to these reports by updating its workforce and strategic plans, HUD has struggled with maintaining these updates and its strategic vision regarding its workforce. For example, the 2019 GAO report on CDBG-DR noted that HUD had not conducted any strategic workforce planning and could not demonstrate that planned hiring would provide the needed knowledge, skills, and abilities for its mission.

In March 2018, HUD adopted a Human Capital Operation Plan and Strategic Workforce Plan and noted particular challenges regarding its aging workforce and the need to close skills gaps.[10] HUD identified in its fiscal year 2018 Performance Report that it had completed strategic workforce and succession planning for 67 percent of its mission-critical occupations.[11]

HUD Relies on Contractors To Conduct Its Mission

With HUD's number of Federal employees in decline, the Department relies on third parties to manage program development, implement and monitor HUD programs, and support HUD planning and policy development. While contracting out for services has enabled HUD to conduct its mission despite a decreasing workforce, HUD faces challenges in overseeing the contractors' substantive program work, monitoring their performance, and evaluating the value of the services. In fiscal year 2017, HUD awarded 1,589 contracts and related commitments with a total cost of $3.9 billion.[12] Ginnie Mae,[13] the Office of Housing,[14] OCIO, and the Office of Administration are the largest users of these contracting services. HUD's fiscal year 2019 Forecast of Contracting Opportunities

[10] This plan is required by 5 CFR (Code of Federal Regulations) part 250, subpart B, and is required to align with the HUD Strategic Plan.
[11] HUD Fiscal Year 2020 Annual Performance Plan and Fiscal Year 2018 Annual Performance Report, p. 79, fn. 171
[12] Evaluation Report, 20017-OE-0006, HUD's Use of Contractors, dated December 20, 2018
[13] In fiscal year 2018 alone, Ginnie Mae obligated $616 million for contractors, while the appropriation for its in-house staff was $27 million. Ginnie Mae has estimated that contractors constitute more than 80 percent of its human capital, with most of those contractors performing core Ginnie Mae functions. See GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019).
[14] Housing relies heavily on contractors for numerous back office functions, most notably to support its claims payments, real-estate owned (REO) program, and asset sales program. Contractors also implement HUD's distressed asset sales program, which is increasingly used by HUD in lieu of REO sales. See GAO report, FHA Property Conveyance, GAO-19-517 (June 2019).

identifies additional HUD functions that rely on contractors, ranging from the development of HUD policy and guidance documents to the comprehensive management of Section 232 program troubled projects – which would include monitoring troubled assets, managing claims, foreclosure, and receivers – and acting as an accounts receivable lender. HUD recently sought industry input for a contract that would establish a HUD Office of Chief Data Officer, including developing the structure and terms of the office, operationalizing the office, developing governance standards, and training HUD staff.[15]

HUD's reliance on third parties for key functions creates challenges for HUD's Federal staff members, who must understand the HUD program and the contract structure and requirements. In its 2019 Enterprise Risk List, HUD acknowledged risks regarding untimely procurement, improper training and workload of contracting officer representatives (COR), and inadequate oversight of vendors and third-party service providers. A contract's failure risks HUD's ability to accomplish its mission. For example, HUD's recent lapse in a contract to operate HUD's records management and tracking system prevented Freedom of Information Act (FOIA) requestors from submitting requests online, and HUD was unable to electronically track requests or redact documents.[16] HUD processed more than 2,000 FOIA requests in both fiscal years 2017 and 2018.[17]

HUD's contract deficiencies have also contributed to the Department's failure to provide OIG with timely access to electronically stored information. In April 2019, the Inspector General outlined for the Secretary the significant negative effects that delayed access to electronically stored information has had on OIG's oversight efforts, specifically in criminal investigations.[18] In 2017, OIG raised similar concerns with deficiencies in HUD's e-discovery contract, which could subject HUD to monetary and other court sanctions and otherwise prevent HUD from effectively prosecuting and defending lawsuits.[19]

HUD's procurement office is understaffed and cannot handle HUD's current procurement needs. In 2014, Ginnie Mae transitioned its contracting needs to the U.S. General Services Administration (GSA) after concluding that HUD could not meet these needs in a timely manner.[20] HUD relies on the U.S. Department of Health and Human Services' Shared Services for acquiring several contracts. Additionally, HUD is working with GSA's Technology Transformation Services' Center for Excellence to procure six major information technology (IT) modernization contracts.

HUD relies heavily on program staff to oversee contracts. CORs generally work in the program offices seeking the services. In many cases, COR functions are an additional duty to the employee's current position. Ginnie Mae has identified a shortage of Federal staff to oversee its contracts.[21]

The Secretary has included the goal of streamlining acquisition management in HUD's 2018-2022 Strategic Plan.[22] HUD's Integrity Taskforce includes a project management

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[15] FedScoop, HUD Wants some Help In Creating Its Office of the Chief Data Officer, dated May 17, 2019
[16] Propublica, HUD's System for Processing Public Records Requests Died During the Shutdown, February 13, 2019
[17] HUD 2018 Annual FOIA Report at https://www.hud.gov/program_offices/administration/foia/foiarpts
[18] Management Alert: OIG Access to Electronically-Stored Information Memorandum No: 2019-IG-001
[19] Evaluation Report 2017-OE-0008, E-Discovery Management System's Capacity To Meet Customer Demand for Electronic Data, dated December 6, 2017
[20] GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019)
[21]GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019). According to the report, Ginnie Mae plans to hire a contractor to help fill this gap.
[22] See HUD Fiscal Year 2020 Annual Performance Plan and Fiscal Year 2018 Annual Performance Report, p. 89.

team focused on this issue, stating that it has completed an assessment of HUD's Procurement Office and has begun to initiate a process to improve time to acquisition and to provide full-time CORs in some offices.

TOP MANAGEMENT CHALLENGE

2

Ensuring the Availability of Affordable Housing That Is Decent, Safe, Sanitary, and in Good Repair

- Affordable Housing
- Safe Housing
- Housing Inspections

HUD is responsible for providing quality, affordable homes for all. HUD's basic property standards require that housing be decent, safe, sanitary, and in good repair. HUD is challenged with addressing the full spectrum of housing needs, from emergency homelessness, low-rent public housing, and multifamily and scattered-sight rental assistance to single-family home ownership. Economic and demographic factors, as well as aging housing stock, contribute to the Nation's severe shortage of safe, affordable housing. HUD needs to take continuous action to ensure that the quality and quantity of affordable and safe housing match demand.

Affordable Housing

HUD has several programs designed to ensure affordable housing for low- to moderate-income households, the largest of which are its public housing and rental housing assistance programs. HUD's 2017 Worst Case Housing Needs Report found that there is a critical unmet need for safe and affordable housing.

Although these programs assist millions of American households, the report found that the supply of affordable rental units for very low-income renters is inadequate, with only 62 affordable units available per 100 very low-income renters and only 38 units available per 100 extremely low-income renters.[23]

Further, because of the rapid increase in renter households and competition among applicants, that scarcity of affordable units is impacting people higher on the income scale. HUD has stated that a family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States.[24]

In June 2019, the President issued an executive order to establish a White House Council on Eliminating Regulatory Barriers to Affordable Housing. Secretary Carson will chair the Council, which is tasked with studying the effects of exclusionary zoning by local governments. These zoning regulations prohibit the development of multifamily complexes in areas zoned for single-family residences. Secretary Carson stated, "Increasing the supply of housing by removing overly burdensome rules and regulations will reduce housing costs, boost economic growth, and provide more Americans with opportunities for economic mobility."[25]

Out of necessity, HUD is implementing a number of creative strategies to address the affordable housing issue. For instance, to address an estimated $35 billion capital needs shortfall, HUD is using programs like the Rental Assistance Demonstration Program (RAD) to encourage public housing agencies (PHA) to transition public housing units to a private-public partnership model. According to an August 2018 newsletter, HUD reports that RAD has saved 100,000 affordable residences.[26] In another example, multifamily project owners who receive tenant subsidies from HUD are using alternative financing vehicles, such as low-income housing tax credits and municipal revenue bonds to leverage capital for aging properties. Under its existing regulatory scheme, this majority of alternate financing processes is outside HUD's control. The long-term effect of both of these approaches remains unknown. OIG's past work demonstrates that some negative effects could derive from these funding models. Some observable and foreseeable consequences include the possible reduction of affordable housing stock as financing is paid off, program funds are defederalized, and regulatory oversight is limited (caused by the absence of regulatory agreements). OIG will continue to monitor HUD's implementation of these strategies to increase the availability of quality, affordable housing.

Safe Housing

In addition to ensuring that affordable housing is available, HUD is responsible for guaranteeing that the units are environmentally safe. HUD's most noteworthy safe housing challenges include addressing lead paint hazards and hazardous waste in public housing.

[23] Worst Case Housing Needs, 2017 Report to Congress, The Office of Policy Development and Research, August 2017
[24] HUD's program definition of affordable housing, https://www.hud.gov/program_offices/comm_planning/affordablehousing/
[25] DS News, Ben Carson Named Affordable Housing Chair, June 25, 2019
[26] HUD Newsletter on Rental Assistance Demonstration, 100,000 Homes Preserved, dated August 13, 2018

Many buildings constructed before 1978 contain lead paint. HUD has created a strategic goal to remove lead-based paint and other health and safety hazards from its housing sites. Recent events at the New York City Housing Authority demonstrate the challenges HUD faces in implementing this goal. For years, the Authority violated key HUD and U.S. Environmental Protection Agency (EPA) lead paint safety regulations, including failure to inspect apartments for lead paint hazards and to remediate peeling lead paint. In a 2018 audit report, OIG found that HUD did not (1) ensure that PHAs properly reported and mitigated cases involving children with lead contamination, (2) establish policies and procedures for PHAs reporting children with lead contamination, or (3) ensure that PHAs completed required lead-based paint inspections.[27]

Lead paint is also a major concern for HUD's multifamily housing programs.

According to the Centers for Disease Control and Prevention, nearly 24 million households contain elevated levels of lead paint, with roughly 1.2 million of these households identified as low income with children under 6 years of age.[28]

While Congress has conducted hearings on viable approaches to permanently deal with these lead problems, no solution has been identified. OIG's continuing work on the hazards of lead paint in public housing indicates that some property owners have disregarded the Lead Safe Housing Rules, with little attempt at compliance.

Drinking water contaminated with lead is also an ongoing public housing issue. In 2016 and 2017, OIG reported that HUD did not provide sufficient guidance and oversight to ensure that properties approved for mortgage insurance had a continuing and sufficient supply of safe and potable water.[29] As a result, HUD may have endorsed loans for properties with water contaminants that affected tenants' health.

In addition to HUD's challenges with lead paint and water contamination, some subsidized housing tenants have an increased risk of contamination from hazardous waste sites, commonly called Superfund sites.[30] After elevated levels of lead were found in the blood of 21 children at the West Calumet Housing Complex in East Chicago in 2016, HUD collaborated with EPA to conduct a nationwide review to identify its properties that were near Superfund sites. EPA found that 18,158 HUD-assisted buildings were located within 1 mile of a Superfund site. EPA also found that approximately 41 percent of the sites had not been cleaned, had ongoing human exposure to toxins, had soil contamination, or had no data to determine the level of exposure to toxins.[31] Although EPA reported these findings to HUD in October 2016, HUD has not determined which

[27] Audit Report 2018-CH-0002, HUD's Oversight of Lead-Based Paint in Public Housing and Housing Choice Voucher Programs, issued June 14, 2018
[28] The Prevalence of Lead-Based Paint Hazards in U.S. Housing, (David Jacobs et al) Envirornmental Health Perspectives, Vol. 110, No. 10, October 2002
[29] Audit Report 2016-PH-0003, HUD Did Not Ensure That Lenders Verified That FHA-Insured Properties in Flint, MI, Had Safe Water, issued July 29, 2016, and Audit Report 2017-PH-0003, Oversight of Safe Water Requirements for FHA-Insured Loans Nationwide, issued September 29, 2017
[30] The Comprehensive Environmental Response, Compensation, and Liability Act, commonly known as Superfund, was enacted by Congress on December 11, 1980. Superfund sites are contaminated sites that exist due to hazardous waste being dumped, left out in the open, or otherwise improperly managed. These sites include manufacturing facilities, processing plants, landfills, and mining sites.
[31] Report entitled EPA/HUD NPL Proximity Analysis, October 2016 (nonpublic)

sites pose the greatest risk to residents and has not tested sites to determine whether contaminants exist, which could endanger nearby residents.

Property owners' use of alternative financing mechanisms has become more prevalent in the subsidized housing market. Specifically, property owners in the multifamily market are using low-income housing tax credits and mortgage revenue bonds to create a funding stream with advantageous financial terms in return for keeping the units affordable for low- and moderate-income households.

The structure of these alternative financing deals can result in the overleveraging of properties and shortages of operating funds, issues that are sometimes revealed through deferred maintenance or the property's inability to meet its financial obligations. Although alternatives to HUD-insured financing are viable options, the properties lack a regulatory agreement (associated with FHA insurance), which provides more safeguards and remedies for HUD than the Section 8 contracts. Additionally, the assignment of a Section 8 contract to a bond servicer creates a situation in which most of the value of the subsidies is committed first to debt service.

OIG investigations reveal that relationships solely governed by the housing assistance payments contract create a severe disadvantage for HUD's ability to enforce the contract terms. When landlords fail to provide decent, safe, and sanitary housing, HUD's only recourse is to terminate the contract. Some landlords have pressed this advantage to their benefit through extracting fees and proceeds from the financing transactions and severely deferring maintenance, the latter of which can create deplorable conditions and in some cases, dangerous and deadly outcomes.

Housing Inspections

HUD is tasked with the challenge of providing oversight of its properties to ensure that they are decent, safe, sanitary, and in good repair. HUD uses Real Estate Assessment Center (REAC) inspections to assess the physical condition of many of HUD's insured and subsidized properties. HUD has acknowledged inspection process limitations, such as the Department's use of a single inspection process, regardless of the property type. HUD is currently modernizing its process with the development and testing of a new protocol called the National Standards for the Physical Inspection of Real Estate (NSPIRE). The NSPIRE process places greater value on the living areas of dwellings and requires the owners' affirmative acknowledgement that their self-inspections are 100 percent completed.

REAC inspections have repeatedly produced substandard and inconsistent results in public housing, multifamily, and healthcare facility inspections. When program participants fail inspections, HUD management is typically slow or completely fails to act. PIH allows PHAs to use Federal funds to hire REAC consultants, resulting in an insider group of REAC Inspectors who coach PHAs and multifamily owners on manipulating the system. HUD acknowledges that the current REAC system permits owners to pass inspection even if they fail the unit inspections. Egregious health and safety violations inside living units are valued at less than one percentage point of the overall score. On multiple occasions, healthcare and multifamily facilities that made few or no changes between REAC inspections would receive substantially different scores in later inspections. Public housing and multifamily properties scoring less than 80 are supposed to be inspected annually; however, despite failing REAC scores, many nursing home properties were not inspected again for more than 3 years. NSPIRE is purported to resolve many of the unacceptable REAC deficiencies that allow units to obtain passing scores while health and safety issues persist.

HUD has expressed a need for nursing home facilities to have inspection procedures separate from those of housing. However, the development of these procedures is not expected to occur until the completion of NSPIRE's 2-year testing period. The Office of Residential Care Facilities is responsible for overseeing the administration of HUD's skilled nursing facilities. HUD policy allows properties with a score of 60 (out of 100) to be inspected solely by the Centers for Medicaid and Medicare Services. The resulting inspection process is skewed toward patient care and disregards the physical structures in which services are provided. This practice, coupled with HUD's self-proclaimed "aggressive avoidance of claim" strategy when dealing with healthcare facilities, creates an environment in which extremely vulnerable individuals may be exposed to unsafe and unhealthy living conditions.

TOP MANAGEMENT CHALLENGE

3

Protecting the Mortgage Insurance Programs

- FHA's Mortgage Insurance Programs Lack Sufficient Safeguards
- HECM Losses Undermine FHA's MMI Fund
- Ginnie Mae's Nonbank Issuers Increase Its Risk
- Ginnie Mae's Shift Toward an Entirely Digital Mortgage Life Cycle Presents New Challenges

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HUD plays a significant role in the housing finance market by providing insurance to private lenders through FHA and expanding market liquidity through Ginnie Mae. FHA provides government insurance and guarantees on single-family mortgages, HECMs, apartment buildings, residential health facilities, and hospitals. By committing the full faith and credit of the United States to repayment of lenders should the borrower default, HUD expands affordable home ownership, rental housing, and healthcare facilities. As of May 2019, FHA had insured more than 8 million mortgages with an outstanding principal balance of nearly $1.2 trillion, amounting to 17 percent of all mortgages in the United States.

Ginnie Mae, a wholly owned corporation within HUD, allows lenders with government-insured and -guaranteed loans to bundle those loans as collateral for mortgage-backed securities (MBS) and sell those securities to investors, thereby recouping funds extended to fund the loans and replenishing lenders' liquidity. Ginnie Mae's outstanding MBS portfolio is valued at more than $2 trillion.[32] Ginnie Mae issuers, which issue the MBS and service the collateral loans, are required to ensure that investors are paid monthly, regardless of whether the borrower pays. The issuer must advance its own funds when

[32] Progress Update: Ginnie Mae 2020-The Road to Modernizing and Enhancing Our Programs, issued June 2019

the borrower defaults until it can make a claim to a loan guarantee agency (for example, FHA). These issuers must have significant liquidity available to meet these obligations.

While Ginnie Mae is funded through fees and maintains a reserve of $15.9 billion,[33] FHA's guarantees are backed by mortgage insurance funds, primarily the Mutual Mortgage Insurance (MMI) Fund. The MMI Fund is funded by insurance fees from borrowers and is used to pay lenders when loans default. If HUD cannot maintain the MMI Fund at a certain level, it must seek an appropriation consistent with Federal Credit Reform requirements.

FHA's Mortgage Insurance Programs Lack Sufficient Safeguards

To maintain the solvency of mortgage insurance programs, FHA must ensure that the borrower meets HUD's eligibility requirements and follows the processes put into place to avoid or minimize default expenses.

Individuals who have delinquent Federal debt or who are subject to Federal administrative offset for delinquent child support are ineligible for FHA-insured loans. Lenders who originate the FHA-insured loans make these eligibility decisions and approve insurance on HUD's behalf. In fiscal year 2019, HUD OIG found that lenders lacked information critical to compliance with Federal requirements and that FHA did not adequately guide lenders on reviewing an applicant's child support records. HUD OIG estimated that in 2016 alone, FHA insured more than 9,500 ineligible loans worth $1.9 billion. As of August 2019, FHA is working with representatives from the U.S. Department of the Treasury's Do Not Pay portal to evaluate using the portal to identify delinquent Federal debt or child support as part of the FHA insurance endorsement process.

When an FHA-insured loan defaults and the lender submits a claim, HUD is obligated to reimburse the lender for losses, including the unreimbursed principal of the mortgage and the holding costs of the lender during the foreclosure and conveyance process. Typically, the longer the process takes, the greater the costs for HUD. HUD regulations incorporate timeframes for foreclosure and conveyance, but HUD does not establish a maximum timeframe for filing a claim or a limitation on holding costs when timeframes are not observed.

HUD regulations require the servicer to obtain a good and marketable title and convey the property to HUD, generally within 30 days of the date on which the servicer filed the foreclosure deed for record. FHA officials said the conveyance process should take about 37 days to complete—30 days for servicers to make necessary repairs and convey title to FHA and 7 days for FHA to inspect the property and process it for sale. A June 2019 GAO report found that from 2010 to 2017, the process for conveying foreclosed-on properties to FHA took a median of 70 days, with servicers exceeding the required conveyance timeframe 55 percent of the time.[34] In 2017 alone, the corresponding figure was 72 percent. In fiscal year 2018, HUD recouped only 54-59 percent of losses paid out on defaulted loans conveyed to HUD.[35]

[33] As of March 2019, this was the balance of Ginnie Mae's Capital Reserve Fund.
[34] GAO report, Federal Housing Administration - Improved Procedures and Assessment Could Increase Efficiency of Foreclosed Property Conveyance, GAO-19-517 (June 2019)
[35] Congressional Research Service report, FHA Single-Family Mortgage Insurance: Financial Status of the Mutual Mortgage Insurance Fund (MMI Fund), by Katie Jones, updated March 4, 2019

In March 2018, FHA implemented a preconveyance inspection pilot, in which FHA physically inspects certain properties and provides the servicer with the opportunity to fix any issues before conveying the property. However, HUD has not addressed the significant lag between HUD timeframes for conveyance, the actual conveyance times of a majority of submitted properties, and the impact of this lag on costs to HUD.

HECM Losses Undermine FHA's MMI Fund

The HECM portfolio has had a longstanding negative impact on the MMI Fund that has worsened this past year. In HUD's 2018 Annual Report to Congress on the financial status of the MMI Fund, HUD reported that the net worth of its HECM portfolio was a negative $13.63 billion. In fiscal year 2018, HECM claims increased to $5.69 billion, up from $5.03 billion reported in fiscal year 2017.

As a result of the rising claims, fiscal year 2018 net cash flow from insurance operations was a negative 21.75 percent of the value of the existing HECM portfolio.

Because the HECM program is complicated and targets an aging population, it is vulnerable to fraud schemes. The program incorporates protections for these borrowers, but they could be improved. For example, applicants are required to attend housing counseling to obtain the HECM loan, but HUD does not require that these sessions be conducted in person. Because a great majority of these counseling sessions take place over the telephone, a housing counselor would not know whether he or she was speaking with the borrower or someone posing as the borrower or whether an interested party or family member was coaching the elderly borrower. According to a 2018 report by the U.S. Special Committee on Aging, elder financial abuse was one of the top 10 consumer scams targeting seniors in 2017.[36]

HUD must ensure that lenders participating in the HECM program comply with HUD requirements and minimize claim costs to HUD. When a loan becomes due and payable, the lender is permitted to submit a claim to HUD for reimbursement of the outstanding loan amount, allowable costs of servicing, and debenture interest (DBI) on the unpaid principal balance. But the lender is required to observe a number of HUD timeframes to claim interest. The failure to observe these timeframes requires that the lender curtail or exclude DBI to the date of failure in the claim to HUD.

Since 2015, the OIG has conducted several investigations, which found that the HECM industry was aware of the DBI regulations and in some cases, chose to ignore them and concealed failures to observe these timeframes. For a time, lenders have acknowledged their failure to follow HUD regulations and were willing to settle with the government. OIG's progress in prosecuting these violations has been hampered, however, by HUD's lack of support. The Department's failure to enforce lender misconduct places HUD at greater risk for losses in the future.

[36] U.S. Special Comm. on Aging, 115th Cong., Fighting Fraud: Senate Aging Committee Identifies Top 10 Scams Targeting Our Nation's Seniors (Comm. Print 2018)

HUD has made several program changes over the years to stabilize the HECM program. FHA plans to continue to assess the HECM portfolio throughout fiscal year 2020 and consider other changes as warranted.[37]

Ginnie Mae's Nonbank Issuers Increase Its Risk

In the past 10 years, Ginnie Mae's issuers have transitioned from being predominantly banks (with an 82 percent majority in 2011) to nonbanks (with a 78 percent majority in 2018).[38] Issuers are responsible for servicing, remitting, and reporting activities on the mortgages that collateralize the MBS. They must have sufficient liquidity to advance payments to investors, even when a borrower does not pay, or advance funds to purchase the loan from the pool. Nonbanks are financial institutions that only offer mortgage-services, have no depositor base, and are less regulated than banking institutions. The average amount of MBS issued per nonbank issuer has increased from $484 million to $1.16 billion within the past 10 years.[39] Both OIG and Ginnie Mae have reported that the increase and complexity of nonbank issuers presents an unmitigated challenge for monitoring efforts.[40]

Nonbank issuers have improved consumer access to federally insured mortgages, but according to Ginnie Mae officials, the sharp growth in nonbank issuers increases HUD's oversight challenges and costs associated with monitoring them. In its 2017 annual report, Ginnie Mae noted that the majority of nonbank issuers involved third parties in their MBS transactions, complicating its oversight of the issuers. Ginnie Mae also noted that monitoring nonbanks significantly increased Ginnie Mae staff's workload.

In addition to an increase in the overall number of nonbank issuers, the concentration of MBS among the largest nonbank issuers has increased. Between 2011 and 2018, the average MBS issuance by the top five nonbank issuers increased from $7.2 billion to $28.7 billion (in fiscal year 2017 dollars). If one of these issuers failed, Ginnie Mae would be significantly impacted if it assumed the defaulted portfolio, as it did with the Taylor, Bean, and Whitaker default in 2009. As of September 2018, the vast majority of the issuers on Ginnie Mae's Watch List—an enhanced oversight tool used to monitor issuers exposing Ginnie Mae to relatively high credit or operational risk—were nonbank issuers.[41]

In a September 2017 audit, OIG found that Ginnie Mae was not prepared for the shift in its issuer base and Ginnie Mae staff lacked necessary skills to respond to increased risks posed by the shift. Ginnie Mae reported that it was exploring proposals or stress testing to assess a lender's liquidity and include a requirement that lenders have a "living will" that describes how the lender would break down its operations in the event of financial distress or the lender's failure.[42] Ginnie Mae has also issued new counterparty risk

[37] Annual Report to Congress on the financial health of FHA's MMI Fund for fiscal year 2018
[38] GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019)
[39] GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019)
[40] OIG Topic Brief, Monitoring of Nonbank Issuers, February 28, 2017
[40] GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019)
[41] GAO report, Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed, GAO-19-191 (April 2019)
[42] Ginnie Mae 2020 Roadmap for Sustaining Low-Cost Homeownership, issued June 2018

requirements for subservicing arrangements, which would warrant enhanced financial requirements for issuers.[43] Ginnie Mae is developing the Default Playbook, which is intended to create a new framework to address issuer default management. While Ginnie Mae has made significant progress in improving and operationalizing the playbook in fiscal year 2018, it is an ongoing project with an expected completion date of September 30, 2020.

Ginnie Mae's Shift Toward an Entirely Digital Mortgage Life Cycle Presents New Challenges

In a fiscal year 2019 report, OIG noted that the mortgage industry's move toward an entirely electronic loan process is an emerging issue for FHA and Ginnie Mae. Because both entities currently rely on paper notes and mortgages, the shift will require adding new platforms and security measures for digital mortgages. This would include digital promissory notes, which are the legal evidence of debts.

Ginnie Mae has committed to modifying the MBS program to include mortgages that only exist in digital form.[44] It concluded that creating a complete digital mortgage process, from loan application through securitization, will increase credit access for many Americans. As of June 2019, Ginnie Mae reports that it is drafting the process, specifically the technology and document requirements an issuer will need to meet to participate in Ginnie Mae's digital mortgage pilot. In the fall of 2019, Ginnie Mae intends to release the official guidance on the agency's digital mortgage pilot.[45] Ginnie Mae issued a request for information through GSA to validate the factors that will impact a request for proposals for an eVault vendor. Ginnie Mae states that it plans to issue a request for contract proposals and award a contract by the fall of 2019.

As its issuers adopt e-notes, Ginnie Mae will need to ensure that it can demonstrate legal ownership of the note should the issuer default. Because a paper note will not exist, Ginnie Mae will need to demonstrate in bankruptcy court that the electronic record is the original note and is secure. Additionally, OIG will need to be able to access and understand the security related to the note and mortgage to conduct audits and investigations.

[43] Ginnie Mae All Participant Memos 18-07, Counterparty Risk Management Policy Series – Volume 1, published November 5, 2018, and 19-02, Counterparty Risk Management Policy Series – Volume 2: Minimum Portfolio Servicing Spread Requirements for Single Family Issuers, published March 7, 2019
[44] Ginnie Mae 2018 Annual Report
[45] Progress Update: Ginnie Mae 2020-The Road to Modernizing and Enhancing Our Programs, published June 2019

TOP MANAGEMENT CHALLENGE

4

Providing Adequate Monitoring and Oversight of Operations and Program Participants

- Insufficient Monitoring of Operations
- Insufficient Monitoring and Oversight of Programs and Program Participants

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HUD implements many of its programs through grants, subsidies, and other payments to State and local government entities, private organizations, and individuals. HUD's program funding amounts to approximately $50 billion per year. HUD relies heavily on partners, such as State and local governments, PHAs, and private housing providers, to use its programs for intended beneficiaries. To protect Federal funds and ensure that intended beneficiaries receive the benefits of these programs, HUD must regularly evaluate the programs' effectiveness and monitor its partners' use of HUD funds.

While the Department has taken steps to improve programmatic risk management and management controls, HUD continues to struggle in effectively managing its own operations and oversight of its program participants' activities. In fiscal year 2019, OIG identified more than $1 billion in questioned costs[46] and more than $7.2 billion in funds to be put to better use.[47] HUD has demonstrated a lack of guidance on appropriate review of programmatic management controls, a lack of staff to conduct monitoring, and a lack of reliable information from program partners used to assess program performance and compliance.

[46] Questioned costs - Costs that have been challenged during the audit by the auditor and are comprised of three categories of costs: ineligible costs, unsupported costs, and unnecessary or unreasonable costs
[47] Funds to be put to better use – Funds to be put to better use quantify monetary savings from management actions in response to OIG recommendations, which prevent improper obligations or expenditures of agency funds or avoid unnecessary expenditures.

Insufficient Monitoring of Operations

For years, OIG has identified HUD's failure to perform its programs' management control reviews (MCR). MCRs are intended to provide reasonable assurance that programs and activities are effectively and efficiently managed and are protected against fraud, waste, abuse, and mismanagement. The MCRs are part of GAO's Standards for Internal Control in Federal Government.[48]

HUD's handbook on conducting MCRs has been removed from its website and has been under revision for the past 2 years, leaving HUD without official guidance on performing these reviews. Since 2015, HUD has not conducted routine or timely MCRs, depriving management of an important monitoring tool that should provide key feedback on the effectiveness and efficiency of departmental operations.[49] HUD plans to revise the Management Controls Handbook in 2020.

HUD has made progress in assessing enterprise risk as required by Office of Management and Budget (OMB) Circular A-123, although the enterprise risk management program modules have yet to be implemented.[50] Enterprise risk and fraud management is one of HUD's eight priority areas in its transformation program. In July 2019, HUD issued a new Front End Risk Assessment Policy Handbook, which is applicable to new and substantially amended HUD programs.

Insufficient Monitoring and Oversight of Programs and Program Participants

HUD's monitoring and oversight of third-party program implementation is an ongoing management challenge. HUD lacks a sufficient monitoring model, which limits its ability to prevent and detect fraud, waste, and mismanagement. As a result, grantees and PHAs misspend or cannot justify the expenditure of millions of dollars, with little risk of detection or repercussions. Additionally, HUD's monitoring does not always identify or address the root cause of performance failures. OIG is focused on the continuing challenges of the three program offices listed below.

Monitoring of CPD

HUD's Office of Community Planning and Development's (CPD) mission is to develop viable communities though integrated approaches that provide decent housing, provide suitable living environments, and expand economic opportunities for low- and moderate-income persons. To accomplish this mission, CPD awards grants to fund community development projects, local affordable housing programs, homeless assistance programs, and disaster recovery efforts.[51] Grant recipients may use subgrantees, other government agencies, and private-sector companies to help them meet their objectives.

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[48] GAO report, Standards for Internal Control in the Federal Government, GAO-14-704G (September 10, 2014)
[49] Audit Report, 2018-FO-0004, Additional Details To Supplement Our Fiscal Years 2017 and 2016 (Restated) U.S. Department of Housing and Urban Development Financial Audit, issued November 15, 2017; Audit Report 2017-FO-0003, Additional Details To Supplement Our Fiscal Years 2016 and 2015 (Restated) U.S. Department of Housing and Urban Development Financial Statement Audit, issued November 15, 2016
[50] OMB, Management's Responsibility for Enterprise Risk Management and Internal Control Structure, Circular No. A-123 (July 15, 2016)
[51] Because of the scope of HUD disaster recovery efforts, this report addresses those management challenges separately.

In numerous audits dating back to 2015, OIG found that HUD conducted little or no monitoring of CPD program grantees. For the monitoring that was conducted, OIG found that CPD could not be assured that its field offices correctly identified its high-risk grantees or conducted adequate monitoring to mitigate program risk.[52] In 2018, OIG performed a comprehensive review of CPD's monitoring model and found that CPD did not have effective supervisory controls and its risk assessment and monitoring did not provide effective oversight of programs and grantees.[53] HUD is working to implement controls based on OIG's report recommendations but has yet to fully implement them.

CPD continues to waive an OMB reporting requirement for grantees to provide information on their grant's obligations, disbursement, and program income,[54] despite annual OIG recommendations since 2014. This information would assist CPD in determining whether grantees complied with applicable regulations and statutes and strengthen its monitoring and oversight of grantees.

Monitoring of PHAs

PIH administers public housing, tenant subsidy, and resident self-sufficiency and economic independence programs. Approximately 57.6 percent of HUD's annual appropriations go through PIH.[55] PHAs are key partners in PIH programs, such as the Housing Choice Voucher Program. HUD electronically monitors the voucher program through a system that relies on PHAs' self-assessments and self-reported information.

Past audits and HUD's onsite reviews have confirmed that these self-assessments are not always accurate, questioning the reliability of the information in PIH systems.

Due to its limited funding for new systems development and staffing constraints, PIH employs a risk-based approach to monitoring. Currently, HUD uses a Two-Year Tool to analyze a PHA's utilization situation and a National Risk Assessment Tool to determine which PHAs need increased monitoring or technical assistance, based on their performance, amount of funding, and compliance scores. HUD will continue to face challenges in monitoring PHAs until it has implemented a reliable, real-time, and all-inclusive monitoring tool.

PIH allows PHAs to use a fee-for-service model by paying a central office cost center for certain expenses rather than allocating overhead costs. This practice affects the funding of the Housing Choice Voucher Program, Public Housing Operating Fund, and Public Housing Capital Fund. Once the allocated funds are paid to the central office cost center, the funds are defederalized and are no longer required to be spent on their respective PIH programs. When OIG questioned HUD's lack of support for its central office cost

[52] Audit Report 2017-FW-0001, HUD's Office of Community Planning and Development Did Not Appropriately Assess State CDBG Grantees' Risk to the Integrity of CPD Programs or Adequately Monitor Its Grantees, issued July 10, 2017
[53] Audit Report 2018-FW-0001, CPD's Risk Assessment and Monitoring Program Did Not Provide Effective Oversight of Federal Funds, issued June 26, 2018
[54] The report is OMB Standard Form 425 – Federal Financial Report.
[55] This calculation did not include supplemental appropriations for disaster recovery.

center fee limits, it found that PHAs transferred ineligible and unsupported funds to the central office cost centers.[56] OIG also found that HUD lacked adequate justification for allowing PHAs to charge an asset management fee, which allows PHAs to defederalize more than $81 million annually.

In December 2018, HUD and OIG reached an agreement on corrective action. HUD agreed to issue rules restricting the use of program funds paid to the central office cost center by requiring those funds to benefit low-income households. HUD also agreed to regularly assess the reasonableness of the central office cost center fee limits. Because of the significance of this issue, PHAs' central office cost center funding will remain a top management challenge until HUD's new rule is adopted. Final action is targeted for completion by May 2020.

Monitoring of Section 232 Residential Care Facilities

FHA provides residential care facilities, such as nursing homes, assisted living facilities, and board and care homes, with mortgage insurance, which can cover the purchase, refinance, new construction, or substantial rehabilitation of a project. HUD has failed to properly monitor these facilities and take appropriate action with troubled properties.

For example, in 2018, OIG conducted an audit of 18 financially challenged nursing homes. OIG found that four of the nursing homes had been in default for up 6.5 years and an additional nine nursing homes should have been classified as troubled.

Along with multiple regulatory agreement violations, OIG found that a majority of the facilities provided inaccurate or incomplete financial data and that the data were not provided in a timely fashion.[57] In 2018, OIG issued a management alert regarding HUD's failure to oversee the physical condition of these facilities.[58]

In July 2018, HUD issued a request for information on contract support to monitor potentially troubled facilities, process default claims, manage receivership for defaulted owners, and manage accounts receivable financing and disposition of the property. No contract has been announced to date, but OIG believes that a contract by HUD for these activities would significantly help in addressing 232 monitoring issues.

[56] Audit Report 2014-LA-0004, HUD Could Not Support the Reasonableness of the Operating and Capital Fund Programs' Fees and Did Not Adequately Monitor Central Office Cost Centers, issued June 30, 2014
[57] Audit Report 2018-BO-0001, HUD's Office of Residential Care Facilities Did Not Always Have and Use Financial Information To Adequately Assess and Monitory Nursing Homes, issued September 17, 2018
[58] Management Alert - HUD Did Not Provide Acceptable Oversight of the Physical Condition of Residential Care Facilities, 2018-CF-0801, issued January 2018

TOP MANAGEMENT CHALLENGE

5

Administering Disaster Recovery Assistance

- Codifying the CDBG-DR Program
- Ensuring That Expenditures Are Eligible and Supported
- Ensuring and Certifying That Grantees Are Following Federal Procurement Regulations
- Addressing Concerns That Citizens Encounter When Seeking Disaster Recovery Assistance
- Preventing Fraud in Disaster Recovery Assistance

HUD plays a key role in assisting individuals and communities recovering from disasters. Since 2001, Congress has appropriated more than $83 billion specifically for disaster recovery assistance. In 2017 and 2018, Congress appropriated $35.8 billion for recovery from Hurricanes Harvey in Texas; Irma in Florida, Georgia, South Carolina, and the U.S. Virgin Islands; Maria in Puerto Rico and the Virgin Islands; and Nate in Mississippi. While disaster assistance is an ongoing challenge for HUD, disaster recovery in Puerto Rico is particularly urgent, given the scope of the devastation, the geographic challenge involved in providing recovery assistance on an island, questions regarding Puerto Rico's capacity to handle funds, and the slow pace of funds and recovery projects.

HUD's primary program for disaster recovery assistance is the CDBG-DR program. Each disaster is funded through a supplemental appropriation separate from HUD's annual CDBG appropriation. Through the CDBG-DR program, HUD awards grants for disaster recovery efforts to States and units of local government, which work with subgrantees and contractors to implement these recovery programs. HUD's role is to rapidly provide funding to jurisdictions, ensure that grantees have the capacity to administer these funds through acceptable programs, and balance the fluid nature of disaster recovery efforts, while ensuring that the funds provided by HUD are being spent properly and effectively.

The following outlines the particular challenge areas for HUD as it administers this ever-growing program.

Codifying the CDBG-DR Program

Unlike other HUD programs, the CDBG-DR program is operated through a series of Federal Register notices. HUD's primary notice containing multiple requirements and waivers is issued for each disaster recovery supplemental appropriation. The primary notice largely repeats the same requirements and waivers from appropriation to appropriation and is periodically updated by additional notices that refer back to the original notices. The supplemental notices issued for more recent disasters may contain new standards that relate to prior disasters. The number of notices continues to increase with each supplemental appropriation, and some grantees manage multiple grants for different disasters.

As of August 2019, HUD had issued 74 notices for CDBG-DR, covering $83.7 billion. Currently, 72 of the notices are being used to oversee 103 active CDBG-DR grants that total more than $55.9 billion.

Beginning in August 2019, HUD announced a separate disaster-related program called CDBG-MIT, which is aimed at disaster mitigation.[59] Since 2018, the program, funded by disaster supplemental appropriations, requires grantees to use a portion of their allocation to mitigate future disaster risks. The program also operates via allocation notices for mitigation funding and will fund grantees for disasters dating back to 2015.

HUD's process is cumbersome and confusing. It delays HUD allocations and forces grantees to cross-reference multiple notices to ensure that they are following the most recent HUD requirements and waivers. CDBG-DR grantees face additional challenges in coordinating the use of CDBG-DR funds with other disaster recovery programs that are initiated at different times and administered by other agencies.

Since 2017, OIG has recommended that HUD codify the CDBG-DR program to simplify the process and standards and to speed up allocation. In March 2019, GAO found that without permanent statutory authority and regulations, such as those that govern other disaster assistance programs, CDBG-DR appropriations require HUD to customize grant requirements for each disaster in Federal Register notices, which is a time-consuming process that delays the disbursement of funds.[60] HUD officials have stated that the permanent authorization of CDBG-DR would allow HUD to issue regulations for disaster recovery and help address grantee challenges.[61] In May 2019, Secretary Carson

[59] HUD Press Release 19-129, HUD Releases Program Requirements for CDBG-Mitigation Program, released August 23, 2019
[60] GAO report, Better Monitoring of Block Grant Funds is Needed, GAO-19-232 (March 25, 2019)
[61] OIG has recommended that HUD issue regulations under the existing CDBG authority. HUD disagrees that it has this authority. See OIG Audit Report 2018-FW-0002, HUD's Office of Block Grant Assistance Had Not Codified the Community Development Block Grant Disaster Recovery Program, issued July 23, 2018.

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2018.[66] In August 2019, HUD announced plans to appoint a Federal financial monitor to oversee Puerto Rico's disbursement of disaster recovery funds.[67] HUD claims that this new position will lead a special team to monitor all disaster recovery funds previously awarded or scheduled to be awarded, which will include 100 percent of expenditures. HUD states that it has established a governance framework for overseeing these funds, but it is unclear whether and how Puerto Rico's oversight processes will be applied to other grantees with which HUD has capacity or oversight concerns.

Ensuring and Certifying That Grantees Are Following Federal Procurement Regulations

OIG continues to have concerns about HUD's ability to ensure that disaster recovery grantees follow Federal procurement regulations. Between 2013 and 2017, 17 OIG audits found issues relating to the procurement of disaster recovery funds, totaling nearly $391.7 million.[68] OIG has raised concerns about HUD's certification standards, which allow States to certify to requirements using their own standards rather than the Federal standard regulating each aspect of the program. Further, the OIG audits found that grantees' procurement processes did not align with HUD's and HUD could not certify that State procurement procedures aligned with HUD's requirements.[69] As a result, products and services may not have been purchased competitively at fair and reasonable prices.[70]

HUD has yet to address OIG's recommendations from the September 2017 rollup report. OIG referred the recommendations to the Assistant Secretary for Community Planning and Development on January 25, 2018, but the Assistant Secretary did not respond. On March 16, 2018, OIG referred these recommendations to the Deputy Secretary for a decision, but as of August 2019, the Deputy Secretary had not responded.

Addressing Concerns That Citizens Encounter When Seeking Disaster Recovery Assistance

Individuals impacted by disaster face challenges in obtaining assistance from HUD or any of the Federal and State agencies, nonprofits, or others offering assistance to those affected by a disaster. According to a recent OIG evaluation, citizens may enter a convoluted process and face substantial difficulties in receiving disaster recovery assistance, depending on how, when, and where they enter the response effort. Many nonprofit, private, and government organizations and agencies provide citizens (homeowners and businesses) with a range of assistance and access options in the disaster response and recovery process. The path of the process is not linear, and citizens may start at various points within the disaster recovery assistance process.

[66] In February 2019, HUD released an additional $8.2 billion to Puerto Rico but in August 2019 determined to delay these funds, citing alleged corruption and government unrest.
[67] HUD Notice 119-115, HUD To Appoint Federal Financial Monitor to Oversee Puerto Rio Disaster Funds, issued August 2, 2019
[68] Audit Report 2017-PH-0002, HUD Did Not Provide Sufficient Guidance and Oversight To Ensure That State Disaster Grantees Followed Proficient Procurement Processes, issued September 22, 2017
[69] Audit Report 2016-PH-0005, HUD Certifications of State Disaster Grantee Procurement Processes, issued September 29, 2016
[70] Audit Report 2017-PH-0002, HUD Did Not Provide Sufficient Guidance and Oversight To Ensure That State Disaster Grantees Followed Proficient Procurement Processes, issued September 22, 2017

Citizens may experience lengthy delays between the initial application process and the closing of their cases, due to inconsistent communication, coordination, and collaboration. Further, citizens may experience delays in funding, duplication of benefits, and other challenges after the process is completed.[71]

Preventing Fraud in Disaster Recovery Assistance

Fraud is an ongoing challenge for HUD as it balances program rules and requirements, while allowing its grantees the flexibility to design their program delivery model in a way that addresses the unique needs of each jurisdiction. HUD must not only include clearly defined requirements, but also strategically design key program forms that are consistent for all grantees and include the proper certifications. OIG investigative staff has identified instances in which HUD's CDBG DR program lacks permanent statutory authority and proper certifications, creating ambiguities that hinder successful prosecutions. Prosecutors across all levels of government are often hesitant to proceed with legal action if these conditions are not met. Additionally, these ambiguous program requirements and a lack of proper certifications present a major risk to grantees and program participants. In the absence of codification of program rules, HUD should define key program requirements and require certifications in key program forms that would be most effective in preventing changes, which would clarify program requirements, improve participant accountability, and better support OIG's criminal and civil enforcement efforts.

Defining Key Program Requirements:

- Grantees and program participants should be clear on the definition of the term "primary residence."
- There should be consistent language incorporated into the action plan and grant agreement, which informs grantees, subgrantees, and contractors that OIG has oversight authority for all CDBG DR spending and that they are obligated to produce all documents, records, and recipient data to OIG upon request.

Enhancing Program Certifications:

- The signing of certifications under the penalty of perjury by grantees, subgrantees, and contractors is among the most effective tools for educating the program participants on the terms and conditions of grants, for preventing fraud from occurring, and for prosecuting fraud when it occurs.
- It is important that certifications address the specific needs of HUD's program areas. HUD should not rely solely on generic certifications, which are of limited usefulness in educating the grantee of its obligations to comply with grant requirements.
- Grantees should be required to certify to specific activities, costs, or requirements so that HUD has evidence that the grantee had knowledge of the grant requirements and indicated its intent to comply with those requirements.

[71] Evaluation Report 2017-OE-0002S, Navigating the Disaster Assistance Process, issued April 10, 2017

TOP MANAGEMENT CHALLENGE

6

Modernizing Technology and the Management and Oversight of Information Technology

- Modernization
- Procurement
- Project Management
- Federal Information Security Modernization Act
- Cybersecurity

For years, HUD has struggled with maintaining its outdated systems, which cannot be adapted to handle HUD's increasingly complex mission tasks. HUD struggles with its information security program's maturity level and cybersecurity issues. It is hindered by its decentralized IT resources spanning across multiple program offices, specialized job vacancies, and a lack of staff expertise in IT.[72]

HUD is making progress with a number of these IT deficiencies under its new Chief Information Officer, but the depth and breadth of these issues will require a multiyear investment and strategy.

Modernization

Between 1974 and 1995, HUD instituted its IT systems to support its program and business processes. These systems are now outdated and incompatible with current technology, making them more susceptible to failure and breach because they are no longer supported through patches and updates. Since 2009, HUD OIG has issued numerous audit and evaluation recommendations related to HUD IT issues. Currently, 230 of these recommendations remain open or unresolved. Additionally, GAO has 22 open recommendations related to HUD's IT issues. HUD legacy systems' maintenance is costly because they require specialized skills to maintain and operate them.

[72] The human capital issues are discussed more fully in Challenge 1: HUD's Human Capital.

These outdated systems create risks for the reliability and security of HUD information. In October 2018, OIG reported on the continued weaknesses of HUD's internal information system data processing controls and security, placing this information at risk for unauthorized access and modification.[73] These outdated systems also impede HUD's ability to report complete and accurate data to the public as required by the Digital Accountability and Transparency Act of 2014 (DATA Act).[74]

HUD has made progress in the past year. As of the fourth quarter of 2018, HUD states that it is compliant with the reporting requirements of the DATA Act for all programs.[75] HUD has also significantly increased its IT investments. In fiscal year 2019, HUD received approximately $459 million for its IT systems and plans to spend about a quarter of this allocation (about $118 million) on major projects. HUD's fiscal year 2019 major project funding dollars more than doubled the previous year's investment amount of $54.8 million.[76] HUD OIG believes this major project funding will help modernize HUD and reduce its systems' recurring operation and maintenance cost. HUD must continue to identify, prioritize, and successfully implement modernization and IT security program improvement efforts and will need to institute proper oversight to ensure that information security is built into all current and future projects.

Procurement

Because HUD IT modernization will occur through acquisition, HUD's procurement capacity and governance are key factors in HUD's IT modernization efforts. According to the Office of the Chief Procurement Officer (OCPO), in fiscal year 2017, fewer than five people were adequately trained or possessed the expertise to manage HUD's IT projects and contracts. OIG has not tracked the trained staff numbers since this report, but OIG's IT Evaluations Division validated that all program offices, including OCIO, continue to have difficulty awarding contracts because of HUD's lack of expertise. Additionally, OCPO has had a difficult time in hiring experienced contracting personnel and has multiple vacancies.

In 2016, GAO reported that HUD lacked well-documented and fully developed selection processes to ensure consistent contract applicant selection criteria.[77] In addition, HUD lacked robust processes to ensure that its contractors met their obligations, such as contractor oversight and contractor performance evaluations against expected outcomes.

While HUD has adopted many acquisition procedures since the 2016 GAO report, it has not fully implemented these procedures, leaving significant gaps in its IT acquisition framework.

HUD contracts have begun to include IT security-specific contracting language and service-level agreements to mitigate and monitor the associated IT risks. Additionally,

[73] HUD Fiscal Year 2018 Federal Information Security Modernization Act of 2014 (FISMA) Evaluation Report, 2018-OE-003, issued October 31, 2018 (nonpublic)
[74] Digital Accountability and Transparency Act of 2014, Public Law 113-101, May 9, 2014
[75] OIG is working to confirm this through its fiscal year 2019 auditing schedule.
[76] Federal IT Dashboard: https://itdashboard.gov/#explore-2017
[77] GAO report, Actions Needed to Incorporate Key Practices into Management Functions and Program Oversight, GAO-16-497 (public release August 19, 2016)

HUD has provided OIG with an acceptable action plan that will use qualitative and quantitative performance metrics to monitor and report on contractor performance regarding IT systems and services. Even with these improvements, HUD will need to incorporate oversight practices to ensure that the corrective plan is consistently implemented.

Project Management

Historically, HUD has maintained a decentralized IT system and application management model that has resulted in autonomous applications operating on multiple platforms across program offices, resulting in duplication of services. Further, OIG has repeatedly found instances in which OCIO did not have an accurate inventory or knowledge of its web application environment,[78] which makes modernization efforts extremely challenging. HUD's 2013 New Core project, which was intended to transition legacy financial systems, failed in 2016.

OIG notes that HUD is now working with GSA's Centers for Excellence to modernize HUD's IT infrastructure by adopting a cloud platform to manage data, a central contact center, and a "customer experience" technology.[79] HUD also plans to create an Office of Chief Data Officer, which will have advance analytics capacity for use in both operations and program management. HUD issued requests for information, which closed in May 2019. HUD must ensure that it applies lessons learned when implementing these critical projects.

Federal Information Security Modernization Act

In 2002, a law passed that required Federal agencies to develop, document, and implement an information security and protection plan. In accordance with the Federal Information Security Modernization Act (FISMA), OIG is required to annually assess HUD's information security program efforts on a maturity model spectrum. OIG's most recent FISMA assessment found that HUD continued to struggle to increase from an overall "defined" level of maturity, or level 2 out of 5 levels. According to OMB and the FISMA OIG metric guidance, a "managed and measurable" maturity level of 4 represents an effective level of security. In the fiscal year 2018 FISMA report, issued October 31, 2018, HUD OIG assigned maturity levels based on the OMB metrics that assess eight IT domains.[80] Table 1 below shows the FISMA report's overall conclusions.

[78] HUD Fiscal Years 2016 and 2018 Federal Information Security Modernization Act of 2014 (FISMA) Evaluation Reports, respectively 2016-OE-006, issued November 9, 2016, and 2018-OE-0003, issued October 31, 2018 (nonpublic)
[79] GSA press release, HUD Issues RFIs for Centers of Excellence Phase II Work, dated May 20, 2019
[80] OMB based these metrics on eight IT domains that align to the five National Institute of Standards and Technology cybersecurity framework function areas. The metrics are assessed using maturity models. These models allow for the measurement of HUD's information security program effectiveness.

Table 1: FISMA results

	Maturity level 1	2	3	4	5
Risk Management	✓	✓	⊖	⊖	⊖
Configuration Management	✓	✓	⊖	⊖	⊖
Identity and Access Management	✓	✓	⊖	⊖	⊖
Data Protection & Privacy	✓	✓	⊖	⊖	⊖
Security Training	✓	✓	⊖	⊖	⊖
Information Security Continuous Monitoring	✓	✓	⊖	⊖	⊖
Incident Response	✓	✓	✓	⊖	⊖
Contingency Planning	✓	✓	⊖	⊖	⊖

Key: 1 - ad hoc, 2 - defined, 3 - consistently implemented, 4 - managed and measureable, 5 – optimized (*level 4 = effective program according to OMB)*

HUD showed improvement in the incident response domain, increasing from level 2 to level 3 from last year, but both the configuration management and identity and access management domains decreased from level 3 to level 2. HUD's newly added domain of data protection and privacy was assessed at level 2. All other areas remained a level 2. HUD has remained at an overall level 2 since the new metrics were introduced in 2016.

The FISMA report highlights specific weaknesses associated with each IT domain. The collective FISMA evaluation reports have a total of 92 recommendations, 30 new recommendations and 62 recommendations from prior FISMA assessments that remain open. HUD demonstrates a lack of overall progress, mostly regresses in all domains except incident response, and clearly has more work to do to achieve a managed and measurable maturity level 4.

Cybersecurity

According to the Consolidated Appropriations Act of 2017, HUD is required to incorporate a cybersecurity funding analysis into the President's budget. The Act identifies cybersecurity as an important component of IT modernization efforts and securing Federal systems from cyber-related threats.[81]

[81]Section 630 of the Consolidated Appropriations Act, 2017 (Public Law No. 115-31) amended 31 U.S.C. (United States Code) 1105(a)(35), which is further discussed at https://www.whitehouse.gov/wp-content/uploads/2018/02/ap_21_cyber_security-fy2019.pdf.

However, HUD continues to allocate far less of its funding for cybersecurity than other CFO agencies, at $16.6 million in fiscal year 2018 and $18.7 million in fiscal year 2019.

This amount is just 5 percent of the total fiscal year 2019 HUD IT budget, compared to other Federal agencies' allocation average of 14 percent.[82] Not only is HUD insufficiently invested in technology, it is underinvested in cybersecurity personnel. The fiscal year 2017 HUD OIG FISMA evaluation report noted that it is important for HUD to develop a common and risk-based approach to allocate resources that address IT risks identified in HUD OIG reports, GAO reports, and HUD self-assessments.[83]

Although HUD has established a working plan to begin the initial stages in monitoring network data and devices, it still does not have a fully operable integrated Security Operations Center capable of monitoring the enterprise technology infrastructure. HUD's outdated cybersecurity policies leave critical process and procedural gaps, resulting in operational risks, despite its added effort to modernize the IT and staff critical personnel shortages.

[82]HUD Fiscal Year 2018 Federal Information Security Modernization Act of 2014 (FISMA) Evaluation Report, 20187-OE-003, issued October 31, 2018 (nonpublic)
[83] HUD Fiscal Year 2017 Federal Information Security Modernization Act of 2014 (FISMA) Evaluation Report, 20187-OE-003, issued October 31, 2017 (nonpublic)

TOP MANAGEMENT CHALLENGE

7

Instituting Sound Financial Management

- HUD's Financial Management Governance
- HUD's Internal Control Framework and Financial Management Maturity
- HUD's Financial Management Systems Weaknesses

HUD's financial management has long suffered due to (1) an immature governance process, (2) ineffective internal controls, and (3) an antiquated financial management system consisting of legacy systems and manual processes that have kept HUD from producing reliable and timely financial reports. As a result, HUD has been unable to achieve an unmodified audit opinion[84] on its financial statements for the last 6 years and has received a disclaimer of opinion for 5 of those years. Ginnie Mae, a HUD component, has also been unable to achieve an unmodified opinion and has received a disclaimer of opinion for the last 5 years due to its poor governance and a weak internal control framework. HUD's CFO has developed and implemented several remediation strategies in an effort to resolve HUD's most longstanding and material deficiencies. While HUD has made significant progress in fiscal year 2019, more work is needed to remediate the effects of years of financial management inattention so that HUD can operate at a level capable of producing reliable financial reports.

HUD's Financial Management Governance

HUD continues to struggle with financial management, due in part to an extended period in which HUD was without leadership in key roles and followed a siloed approach to financial management, which weakened HUD's internal control environment and

[84] Codification of Statements on Auditing Standards, AU-C Section 700.11, T4e opinion expressed by the auditor when the auditor concludes that the financial statements are presented fairly, in all material respects, in accordance with the applicable financial reporting framework

framework. These weaknesses caused preventable deficiencies to occur undetected and have precluded HUD from resolving financial integrity issues in a timely manner. As of June 2019, HUD has more than 250 open audit recommendations stemming from the Annual Consolidated Financial Statement and Federal Information System Controls Audit Manual audits.

As part of an Office of the Chief Financial Officer (OCFO) transformation strategy, HUD's CFO has begun to address these challenges by establishing basic governance structures, providing direction, and instilling entity-wide accountability for sound financial management. The OCFO transformation strategy includes (1) improving governance and communication and building relationships across the agency, (2) improving internal controls by evaluating audit findings and developing overall remediation plans and execution, and (3) working with HUD's Chief Information Officer on an IT strategy to address OCFO data needs. During fiscal year 2019, HUD prioritized the implementation and closure of many open recommendations, efforts that will continue in 2020. While HUD's objectives and strategy are dynamic and could broadly affect the entire agency, it will require significant financial and human resources commitments from the HUD Secretary, Congress, and other stakeholders and will take years to implement. In addition, Ginnie Mae implemented a loan-level accounting system in fiscal year 2019, which Ginnie Mae claims will resolve many longstanding weaknesses that have prevented a complete audit of its financial statements for the last 5 years. HUD OIG's audit work in this area is ongoing, and the audit results will be reported at a later date.

HUD's Internal Control Framework and Financial Management Maturity

HUD operates at a financial maturity level, which is, at best, "basic" based on the U.S. Treasury's Financial Management Maturity Model.

Additionally, HUD's most recent OMB Circular A-123 reviews have cited 21 of 42 financial reporting and complementary internal controls as "failing" or not properly designed.

HUD's weakened internal control framework has caused reporting errors in HUD's financial reporting, requiring HUD to restate its financial statements for the last 5 consecutive years. OIG has found that in prior years, HUD was noncompliant with the DATA Act,[85] the Improper Payments and Elimination and Recovery Act (IPERA), the Debt Collection Improvement Act, the Federal Financial Management Improvement Act, and the Federal Managers Financial Integrity Act.[86]

[85] Audit Report 2018-FO-0001, DATA Act Compliance Audit of the U.S. Department of Housing and Urban Development, issued November 3, 2017
[86] Audit Report 2018-FO-0004, Additional Details To Supplement Our Fiscal Years 2017 and 2016 (Restated) U.S. Department of Housing and Urban Development Financial Statement Audit, issued November 14, 2017, reissued December 6, 2017

In the past year, HUD has made significant efforts in addressing these deficiencies. HUD has indicated that its financial management processes are now 100 percent compliant with DATA Act standards. OIG's Office of Audit is currently reviewing HUD's claim and will report results later this year. HUD has also developed a corrective action plan to be compliant with IPERA by 2020.

In fiscal year 2019, after 5 years of development, Ginnie Mae has completed its accounting policies and procedures and developed internal controls for its nonpooled loan asset portfolio. OIG is currently evaluating these controls to determine whether they will resolve longstanding noncompliance, which has prevented HUD from auditing Ginnie Mae's financial statements for the last 5 years.

HUD needs to continue to work on completing its policies, procedures, and other artifacts necessary to resolve HUD's internal control deficiencies and improve its maturity level.

HUD's Financial Management Systems Weaknesses

For several years, OIG has reported on HUD's antiquated financial management systems and infrastructure, which challenge HUD's ability to produce timely and reliable financial reports and comply with significant laws and regulations. Several significant financial business processes continue to be manual or are nonexistent, resulting in unreliable and untimely financial reporting and poor financial management oversight. For example, PIH complies with cash management requirements, using manual processes and Excel spreadsheets, resulting in untimely reports on HUD's accounting for prepayments, accounts payable, and accounts receivable. Additionally, HUD lacks an adequate cost accounting system that can accurately report program costs.

HUD is still recovering from an unsuccessful attempt to transition specific core accounting functions to a shared service provider. The transition resulted in significant differences between the General Ledger and subsidiary systems, which remain unresolved 4 years after implementation.

In the past year, HUD has made progress. Ginnie Mae has implemented an automated system to process its accounting activities for its nonpooled loan assets portfolio, which totaled a net of $3 billion as of September 30, 2018. OIG's audit of this system implementation is ongoing.

In addition, HUD began a pilot program that uses a module of Oracle Federal Financials to properly account for its property, plant, and equipment (PP&E). Previously, HUD did not have a proper information system to support the financial reporting requirements for its PP&E.

HUD continues to face challenges in maintaining its legacy systems and ensuring that they can support proper financial management of HUD's numerous programs and operations.

TOP MANAGEMENT CHALLENGE

8

Ensuring Ethical Conduct

- Revolving Door With Related Industries
- HUD's Reliance on External Actors To Carry Out Its Assisted Housing Mission
- Better Detection and Deterrence of Ethical Misconduct Needed To Benefit the Department's Mission

HUD relies heavily on external parties to implement and manage its programs. While close relationships with private-sector and other external actors may be necessary for HUD to carry out its work, these relationships pose a risk that conflicts of interest or similar ethical misconduct will prevent the Department from effectively carrying out its mission.

Revolving Door With Related Industries

HUD works closely with State and local government and private entities, which focus on implementing and managing HUD programs and rely heavily on HUD grants, insurance, and subsidies to support their enterprises. In addition, the employees of these entities are highly experienced and knowledgeable about HUD programs and are a natural source of hiring for the Department. It is common for representatives of an industry to leverage their experience and expertise to fill senior-level positions within the Department and then to leverage the experience and expertise gained at HUD to secure prominent positions within the industry.

While HUD benefits from the knowledge and abilities that industry representatives bring with them when they enter government service, employees transitioning between HUD and the industries it regulates present a significant "revolving door" risk for the Department. HUD must ensure that its employees act for the benefit of the public and remain free from any actual or perceived conflicts of interest. HUD must also safeguard nonpublic, predecisional information and ensure that its policymaking process is fair to all market participants and free from undue influence. Even the appearance that departmental decisions are influenced by improper considerations of personal gain undermines the credibility and integrity of those decisions.

Over the last several years, HUD OIG has investigated instances of senior-level HUD employees using their positions at the Department to provide inappropriate access to particular program participants, improperly hire former colleagues, improperly leverage their former HUD positions to obtain information from departmental staff, or otherwise improperly benefit themselves or others.

For example, in 2014, HUD OIG raised numerous concerns with the Department's entering into an agreement to permit a high-ranking Council of Large Public Housing Authorities (CLPHA) employee to serve a detail assignment in a senior HUD position from 2011 to 2014. While in this position, the detailee improperly hired a former colleague and exhibited bias in favor of CLPHA in developing HUD policy and guidance. Within this same timeframe, HUD entered into similar agreements with other detailees, which granted those detailees policymaking authority over the same programs in which their private employer participated.

HUD OIG has also investigated several cases of senior officials seeking or negotiating employment with firms in the mortgage-banking industry and failing to appropriately recuse themselves from departmental decision making impacting those firms. Similarly, OIG has also investigated instances in which senior officials failed to fully recuse themselves from decisions affecting their former employers.

The Department must rely on its senior officials to identify potential conflicts of interest and remove themselves from decisions affected by those conflicts. While the law and departmental policy contain safeguards to ensure that current and former employees do not misuse their HUD positions and remain free from conflicts of interest, these cases suggest that HUD faces significant challenges in monitoring, identifying, and mitigating potential ethical lapses. These challenges present significant risk to the Department's reputation and program integrity.

HUD's Reliance on External Actors To Carry Out Its Assisted Housing Mission

HUD relies substantially on nongovernmental actors to carry out its assisted housing mission, and a key part of accomplishing this mission is to ensure that those actors follow the basic standards of ethical conduct. However, several recent OIG audits, evaluations, and investigations have shown that actual or apparent conflicts of interest are commonly found in underperforming or troubled PHAs.

For example, OIG identified conflicts of interest in its 2018 evaluation report on a severely troubled PHA in Alexander County, IL.[87] The report described how the PHA had violated multiple legal and policy restrictions, misused Federal funds, committed civil rights violations, and created deplorable housing conditions for its residents. Evidence of the PHA's extreme dysfunction was evident in its hiring and procurement practices, which did not meet acceptable ethical standards. Further, the evaluation noted that nepotism was so pervasive in the PHA's staffing arrangements that its organizational chart resembled a "family tree."

OIG further identified ethical lapses by Alexander County Housing Authority leadership officials in a 2019 investigative report.[88] The report found that the Authority's long-tenured executive director negotiated both sides of a contract, authorizing him to provide consulting services to the Authority. He then resigned from his executive director position to obtain a $50,000 buyout and began collecting payments from the Authority on the consulting contract he had arranged for himself.

OIG has dozens of similar "public corruption" open investigations, which largely focus on assisted PHA officials allegedly misusing their positions to benefit themselves, family members, or friends or otherwise engaging in ethical misconduct.

Several recent audits have also shown how ethical misconduct is commonly associated with problematic or troubled PHAs. For example, a 2018 audit found that a historically troubled PHA in Maryland spent more than $1.6 million in program funds on contracting services from companies owned by individuals related to its leadership officials.[89] A 2016 audit found that an Alabama PHA with thousands of prospective tenants on its waiting list failed to provide necessary rehabilitation for hundreds of its public housing units, despite making $1.2 million in payments to a construction company owned by a relative of one of its leadership officials.[90]

Better Detection and Deterrence of Ethical Misconduct Needed To Benefit the Department's Mission

OIG believes that improvements in the Department's ability to detect and deter ethical misconduct would increase the level of efficiency and public trust in its operations. HUD should look for ways to improve upon its existing programs aimed at promoting compliance with Federal ethics regulations, including improvements to its employee training and reporting requirements and in how it counsels employees when potential ethics issues arise. HUD should also find ways to enhance its ability to identify and prevent ethical lapses by its program participants to ensure that they are capable of carrying out their responsibilities effectively.

[87] Evaluation Report 2017-OE-0014, HUD's Oversight of the Alexander County Housing Authority, issued July 24, 2018
[88] June 5, 2019, Report of Investigation, Alexander County Housing Authority's Improper Usage of HUD Subsidized Asset Management Project Funds
[89] Audit Report 2018-PH-1007, Crisfield Housing Authority, Crisfield, MD, Public Housing Program Operating and Capital Funds, issued September 25, 2018
[90] Audit Report 2016-AT-1010, Mobile Housing Board, Mobile, AL, issued August 4, 2016

Management's Response to the OIG Report on Management and Performance Challenges

HUD is committed to fulfilling its mission to create strong, sustainable, inclusive communities, and quality affordable homes for Americans. The work of the HUD OIG is intended to help HUD ensure that our workforce operates with fairness and integrity, and that our programs are delivered in the most efficient and effective way possible.

We are laser focused on improving our business operations by addressing serious challenges, mitigating the risks associated with our programs and past practices, and transforming our processes to address waste, fraud and abuse. We are also committed to addressing open OIG audit findings by proactively updating our policies, streamlining our financial reporting procedures, collaborating with stakeholders, and educating our workforce.

We are continuing to prioritize infrastructure improvements related to human capital, and although more work needs to be done, we have taken steps to improve our hiring process and engage our employees in problem solving efforts aimed at achieving organizational goals and improving the quality of work. We are also working to transform our information technology program by supporting the center of excellence activities, enhancing our acquisition management processes, and prioritizing efforts to improve customer experience.

Over the last year, we made substantial progress in the area of governance and program management. We improved internal controls and implemented a robust Enterprise and Fraud Risk Management framework to enhance coordination, improve reporting and better combat fraud. We believe that organizational excellence is achieved by leveraging diversity, fostering a culture of ethics and integrity, and promoting increased transparency. To this end, we have launched a number of substantive efforts including an Agency-wide Integrity Task Force and a Financial Transformation Plan to help us remediate our remaining material weaknesses and deficiencies. HUD is fully committed to supporting and stimulating continuous process improvement and we will continue to make smart investments in technology and people to achieve our goal of financial excellence and ensure effective mission delivery.

Additionally, we recognize the important role HUD plays in assisting individuals and communities in recovering from disasters. We remain committed to helping those in need by further enhancing our disaster program oversight, working to simplify the processes, and focusing on improving the citizen experience.

We will use the findings to help inform process improvement efforts and guide us in solving our most pressing management challenges, we were expecting more rigor in a number of audits. We are vested in working collaboratively with the OIG to foster a problem-solving environment that instills more audit rigor, improves mission delivery, better services America's taxpayers, and creates the best place to work for our most valuable asset, our employees.

Summary of Financial Statement Audit and Management Assurances

For FY 2019, one material weakness was identified by the OIG in HUD's Consolidated Financial Statement Audit Report. Table 1 presents a summary of the results of the independent audit of HUD's consolidated financial statements. Table 2 is a summary of HUD's *Federal Managers Financial Integrity Act of 1982 (FMFIA)* management assurances.

Table 1: Summary Financial Statement Audit

Summary of Financial Statement Audit					
Audit Opinion	Qualified				
Restatement	No				
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Ending Balance
1. Weak Internal Controls Over Financial Reporting (HUD, Ginnie Mae, FHA)	1	0	1	0	0
2. HUD Did Not Always Comply with GAAP	1	0	0	0	1
3. Non-Pooled Loans and Loan Loss Allowance Not Supportable (Ginnie Mae)	1	0	0	1	0
4. Departmental Financial Management Systems Weaknesses	1	0	1	0	0
5. Weaknesses in FHA Modeling Processes	1	0	1	0	0
Total Material Weaknesses	**5**	**0**	**3**	**1**	**1**

Table 2: Summary of Management Assurances

Effectiveness of Internal Control over Financial Reporting (FMFIA § 2)						
Statement of Assurance	Modified					
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
1. Weak Internal Controls Over Financial Reporting (HUD, Ginnie Mae, FHA)	1	0	1	0	0	0
2. HUD Did Not Always Comply with GAAP	1	0	0	0	0	1
3. Non-Pooled Loans and Loan Loss Allowance Not Supportable (Ginnie Mae)	1	0	0	1	0	0
4. Departmental Financial Management Systems Weaknesses	1	0	1	0	0	0
5. Weaknesses in FHA Modeling Processes	1	0	1	0	0	0
Total Material Weaknesses	**5**	**0**	**3**	**1**	**0**	**1**

Effectiveness of Internal Control over Operations (FMFIA § 2)						
Statement of Assurance	Modified					
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
N/A	0	0	0	0	0	0
Total Material Weaknesses	**0**	**0**	**0**	**0**	**0**	**0**

Compliance with Federal Financial Management System Requirements (FMFIA § 4)						
Statement of Assurance	Federal Systems do not comply to financial management systems requirements					
Non-Compliance	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
1. FAMES	1	0	0	0	0	1
2. IDIS	1	0	0	0	0	1
3. DRGR	1	0	0	0	0	1
4. NCIS	1	0	0	0	0	1
5. SMART	1	0	0	0	0	1
6. SAMS	1	0	1	0	0	0
7. TRACS	1	0	0	0	0	1
8. GFAS	1	0	0	0	0	1
9. IPMS	0	1	0	0	0	1
Total non-compliances	**8**	**1**	1	**0**	**0**	**8**

Compliance with *Section 803(a)* of *Federal Financial Management Improvement Act*		
	Agency	Auditor
1. Federal Financial Management System Requirements	Lack of compliance noted	Lack of compliance noted
2. Applicable Federal Accounting Standards	Lack of compliance noted	Lack of compliance noted
3. USSGL at Transaction Level	Lack of compliance noted	Lack of compliance noted

FY 2019 OCFO Accomplishments

The OCFO made substantial progress towards achieving several of its financial transformation and strategic objectives in FY 2019. The OCFO has demonstrated a commitment to investing in its people, processes, and technology to advance the HUD's goals of protecting taxpayer funds while maintaining efficient and effective operations and we will continue to make improvements. In line with this commitment, OCFO recently initiated the launch of a new Accountability, Integrity, and Risk (AIR) transformation to promote fiscal accountability through a strong governance system and agency-wide coordination.

Finance Transformation Plan

FY 2019 was a year of progress in the area of intelligent automation. Robotic Process Automation (RPA), Artificial Intelligence (AI) and data analytics were successfully leveraged to generate efficiencies, improve the quality of work and streamline work processes.

- Developed and implemented RPA and AI which has identified 31 processes which is projected to save approximately 60,000 labor hours.
- Successfully automated a grant validation process that previously took six and a half months and 2,100 hours to complete. Reduced it to a 65-hour process, saved over 2,000 Full-Time Equivalent staff hours, increased efficiency by 97 percent, and reduced cycle time to four weeks.
- Automated a subsidy pre-payment estimate process which generated an annual savings of about 500 staff hours, reduced the process to about 40 hours of work and improved cycle time.
- Strengthened operations through automating data analytics to ensure effective controls over the budget funding used across HUD. The automated tool is projected to save 480 hours.
- Established an automated tool for travel charge card expenses to detect fraud, identify anomalies and trends, and strengthen internal controls. The automated tool is projected to save 1,000 hours.
- Developed and executed the first HUD payroll fraud data analytics project, which confirmed the effectiveness of HUD's internal controls over payroll processing, helped to inform future reviews, and resulted in the creation of a new desktop tool for expediting payroll reviews.
- Saved $2.7M by lowering the costs of HUD shared services from $39.1M in FY 2018 to $36.4M in FY 2019 by using metrics and analysis to inform service level negotiations.
- Designed and began an agency-wide data analytics strategy and roadmap.
- Implemented Oracle Business Intelligence (OBI) financial reporting tool to replace the legacy Oracle Discoverer system. Reports in Discoverer were reviewed and recreated in OBI to provide more robust data with fewer reports and alternate data views in the same reports.

- Developed the concept of operations and roadmap for a centralized function that will operate as a shared service provider to deliver RPA and other intelligent automation technologies to HUD programs.
- Provided leadership for the interagency working group on Management Reporting and Business Cases for the General Services Administration (GSA) led RPA Community of Practice. This working group is developing a playbook to assist government agencies in developing a performance management framework and articulating return-on- investment for RPA programs.

Improved Governance – Policy Development and Implementation

The OCFO made substantial progress in the area of policy development and implementation by focusing on consistency and clarity in documenting policies and advancing just-in-time educational campaigns to ensure changes were effectively communicated to the HUD workforce.

- Successfully updated or created more than 60 financial policies and procedures, an 83 percent increase in documentation over the prior year by moving from theory to practice with a formal policy development methodology, launching a quarterly review process, and establishing a centralized online repository for storing all OCFO policies and procedures.
- Developed the Open Obligation Review Policy and provided subsequent trainings to facilitate a timely and well-coordinated implementation. The policy included procedures for de-obligating funds with a value of $500 or less giving OCPO the ability to perform contract close out without the lengthy close out process.
- Updated HUD's accounting policy pertaining to Property Plant and Equipment (PP&E). Specifically, OCFO changed to the prospective capitalization method under *SFFAS 50* to re-baseline its internal use software (IUS) and IUS in Development.
- Developed educational programs across the Department and among our grantees, reaching 1,683 stakeholders—a 24-fold increase from last year. Expanded training topics and increased the number of training sessions by 400 percent for the CFO Educational Seminar, offered specialized training courses, and leveraged technology to allow repeatability.
- Developed a Cost Allocation policy and continued to streamline the methodology to gain a more effective and efficient process as HUD moves towards the automation phase.

Fiscal Responsibility and Success in Audit Remediation

As a trustee of government funds, OCFO holds itself and abides by high ethical standards that puts the best interest of the public at the forefront. The most important factor in fiscal responsibility is to ensure that the money HUD receives is spent wisely on programs directly related to our mission. As evidence of our commitment to fiscal responsibility and success in audit remediation OCFO has eliminated the audit disclaimer from the FY 2019 audit report and reduced the number of material weaknesses from five to one. Below are other examples of OCFO's demonstration of fiscal responsibility:

- Improved and streamlined our financial statement close process and continued to strengthen our internal controls and data quality.
- Ginnie Mae fully implemented the Subledger Database (SLDB) solution to perform loan-level transaction accounting on its NPA, drafted and implemented Procedures with validation steps over SLDB processing, and conducted several trainings on the SLDB end-to-end process.
- FHA achieved an unqualified audit opinion, resolving financial reporting material weaknesses that existed last fiscal year. FHA's clean audit opinion is a significant step towards an unqualified opinion for HUD's consolidated financial report.
- Assisted program offices with daily guidance during the lapse in appropriations to prevent Anti Deficiency Act violations. Continued support post lapse to update the Department's lapse contingency plan and respond to Congressional oversight requests.
- Attended regular meetings on Opportunity Zones, a secretarial priority. Ensured that funding for this initiative was included in the 2021 Budget.
- Worked with OMB and CPD to develop a process to recover expired Homeless Assistance Grants funding. Recovered and converted approximately $55 million of expired prior year funds to no-year funds.
- Supported the government-wide "Reduce the Footprint" initiative through various accomplishments, including: 1) achieving 65 percent electronic PHA audit confirmations to provide more efficiency with the use of electronic signatures and PDF screen prints without the use of scanners; and 2) digitizing approximately 1,500 hardcopy audit and review files, resulting in a reduced carbon footprint, reduced response time in locating and accessing historic files, and improved reliability of historic files.
- Due to the strong collaborative effort with OCIO during FY 2019, OCFO was able to successfully migrate Program Accounting System (PAS) functionality into Line of Credit Control System (LOCCS) to meet the Federal CIO's November 2019 deadline. Completed the Authority to Operate to deploy the new LOCCS system 10 days before the established due date. This will lead to the decommissioning of PAS, a system that has been operational since 1974. As a result, HUD successfully completed Phase 1 of the LOCCS Unisys Mainframe Project.
- Closed four (4) Financial Management Systems material weakness conditions as follows:
    1. HUD IT PPM (Project, Planning, and Management),
    2. Implementing a loan guarantee system,
    3. Implementing and using the ARC OneStream Financial Reporting system.
    4. Resolve DRGR FFMIA deficiencies identified in the *2018-FW-0802 OIG Ft. Worth Audit Report.*
- Worked with Office of Housing to bring the Single Family Acquired Asset Management System (SAMS) into compliance with the *Federal Financial Management Improvement Act (FFMIA)*.
- Decommissioned the HUD Consolidated Financial Statement System (HCFSS) so that funding previously used for operating and maintaining a legacy system can be put to better use.

- Accounting processed over $6 billion in the Secured Payment System (SPS) during the federal shutdown. The bulk of the payments were Section 8 payments. These payments were vital to HUD's mission of providing safe, decent, affordable housing for the American people.
- Reconciled program and accounting systems for the Emergency Home Loan Program which resolved $180 million in subledger differences. This reconciliation provided Accounting the ability to return over $300 million in cash back to Treasury. Congress can now appropriate these funds to help additional low-income families.

Over the last two years, OCFO reduced the number of material weaknesses and significant deficiencies through dedication of the HUD staff. Below are examples that exemplify the excellent improvements made in various audit remediation areas:

- Resolved audit recommendations and eliminated the disclaimer of opinion through extensive data analysis and a focus on verification of transactions to confirm consistency with Generally Accepted Accounting Principles.
- Spearheaded significant progress towards addressing prior year challenges relating to accounting for HUD PP&E by revising HUD's PP&E accounting policy to align with accounting standards, improving the auditability of PP&E balances, and making improvements to HUD PP&E processes in coordination with key stakeholders.
- Worked with the Office of Native American Programs (ONAP) to estimate and validate the investment values held by tribes.
- Made significant improvements to its PIH HCV prepayment estimation and validation processes to address prior year OIG recommendations.
- Achieved 100 percent compliance with *DATA Act* requirements and established a Department-wide Data Quality Plan. Closed all eight (8) prior year *DATA Act* recommendations and HUD OIG referred to HUD's data as "higher quality" in their latest audit report.
- Closed 730 audit recommendations, with Public and Indian Housing leading the way by closing 248 recommendations, followed by Housing which closed 180 recommendations.
- Increased closure rate for audit recommendation by 33 percent in FY 2019.
- Refined subledger processes resulting in no material differences, few differences overall, and quicker resolution of differences.
- Certified substantially all open obligations timely for the first time in three years and improved timeliness of deobligation.

Oversight of Community Development Block Grant (CDBG) – Disaster Recovery (DR)

Oversight of CDBGs for disaster recovery and related controls improved significantly in FY 2019.

- Performed an in-depth root-cause analysis of how HUD reports its disaster recovery expenditures to ensure the CDBG-DR program reporting complied with accounting principles and was well-positioned for future reporting in this area.
- To improve CDBG oversight and coordination with other federal agencies, the OCFO prepared monthly financial reports on disaster assistance allocations, obligations and outlays by state and territory. These reports supported HUD's role in the cross-agency Recovery Support Function Leadership Group (RSFLG), which is designed to help communities recover from disasters.
- Worked closely with the Office of Community Planning and Development (CPD) to develop monitoring procedures of CDBG-DR grantees, including controls over the flow of funds to the end recipient. The new monitoring procedures are being rolled out to grantees receiving funds associated with Hurricanes Harvey, Irma, and Maria.
- As part of monitoring efforts, HUD senior staff joined members of other Federal agencies and a Congressional delegation to conduct a site visit to disaster areas in Puerto Rico.
- Completed extensive data analyses with respect to the Sandy Disaster Assistance *Antideficiency Act (ADA)* investigation, notified the OIG that the ADA was not violated, and timely processed and provided worked with OIG with evidence to close the associated audit recommendations, unsupported costs, and ultimately remove the related disclaimer.

Enterprise Fraud Risk Management (EFRM)

In FY 2019, HUD's EFRM program achieved many critical milestones towards institutionalizing a risk governance framework throughout the agency and continuing to formalize the departmental program through the design, implementation, and evaluation of risk management processes and controls.

- Incorporated EFRM considerations into the initial FY 2021 HUD Budget Formulation exercise.
- Launched risk analytics proof-of-concept with CPD on grantee risk indicators.
- Formalized EFRM Governance through the launched of the Risk Management Council (RMC) establishing a governing body for the identification, assessment and monitoring of HUD's enterprise risks.
- Completed FY 2019 Enterprise Risk Profile Refresh with increased emphasis on internal controls and mitigation strategies, root causes, and fraud risk identification.
- Formalized Fraud Analytics Working Group (FAWG) and associated Charter to enhance and further implement risk data analytics efforts.

Payment Integrity

This section discusses HUD's compliance efforts with the *Improper Payments Information Act of 2002 (IPIA)*, as amended by the *Improper Payments Elimination and Recovery Act of 2010 (IPERA)*, and the *Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA)*. For more detailed information on HUD's *IPERIA* compliance effort, please visit https://paymentaccuracy.gov/.

Payment Reporting

FY 2019 is the second year HUD conducted testing for FHA-Single Family Insurance Claims (SFIC) and Ginnie Mae Contractor Payments. These programs were identified as high risk in FY 2017. The tables below provide an overall outlook on the results of HUD's improper payment testing based on OMB guidance.[45]

Improper Payment Reduction Outlook – FY 2019 (Dollars in Millions)					
Program Name	**Outlays**	**Properly Paid Amount**	**Properly Paid Percentage Rate**	**Improperly Paid Amount**	**Improperly Paid Percentage Rate**
FHA – SFIC	$7,941.11	$7,868.49	99.09%	$72.62	0.91%
Ginnie Mae Contractor Payments[46]	$154.51	$146.67	94.93%	$7.84	5.07%

Improper Payment Reduction Outlook – FY 2019 Continued (Dollars in Millions)					
Program Name	**Overpayment Amount**	**Underpayment Amount**	**Improper Payments Made Directly by the Government**	**Improper Payments Made by Recipients of Federal Funds**	**Reduction Target**
FHA – SFIC	$72.62	$0.00	$72.62	$0.00	0.85%
Ginnie Mae Contractor Payments	$7.54	$0.30	$7.84	$0.00	5.00%

[45] HUD reports on prior year data for *IPERIA*. Figures represent information based on FY 2018 data, except for the Do Not Pay section that has information based on FY 2019 data.

[46] The achieved precision of the estimated properly/improperly paid rates is 1.17 percent at the 95 percent confidence level.

Improper Payment Reduction Outlook – FY 2019 Continued (Dollars in Millions)				
Program Name	**Monetary Loss Amount**	**Monetary Loss Percentage Rate**	**Monetary Loss Within Agency Control**	**Monetary Loss Outside Agency Control**
FHA – SFIC	$29.90	0.38%[47]	$29.90	$0.00
Ginnie Mae Contractor Payments	$0.60	0.39%	$0.60	$0.00

Improper Payment Reduction Outlook – FY 2019 Continued (Dollars in Millions)				
Program Name	**Unknown Amount[48]**	**Unknown Percentage Rate**	**Non-Monetary Loss Amount**	**Non-Monetary Loss Percentage Rate**
FHA – SFIC	$42.71	0.54%[3]	$0.00	0.00%
Ginnie Mae Contractor Payments	$6.94	4.49%	$0.30	0.19%

Improper Payment Root Causes (Dollars in Millions)				
Program Name	**Payment Type**	**Insufficient Documentation to Determine[49]**	**Administrative & Process Errors**	**Total**
FHA – SFIC	Overpayments	$42.71	$29.90	$72.62[50]
FHA – SFIC	Underpayments	N/A	$0.00	$0.00
Ginnie Mae Contractor Payments	Overpayments	$6.94	$0.60	$7.54
Ginnie Mae Contractor Payments	Underpayments	N/A	$0.30	$0.30

[47] The total improper payment rate for FHA – SFIC is 0.91 percent. The sum of the monetary loss and unknown percentage rates differ by 0.01 percent due to rounding.

[48] Unknown is the estimated amount related to insufficient or lack of documentation.

[49] Insufficient documentation to determine represents the unknown estimated improper payment amount.

[50] The total FHA – SFIC overpayments total $72.62 due to rounding.

Corrective Action Plans

Ginnie Mae Contractor Payments

The FY 2019 improper payments estimated for Ginnie Mae Contractor Payments do not exceed the statutory thresholds listed in OMB *Circular A-123, Appendix C, Part I.B.1* (improper payments exceeding either: 1) both 1.5 percent of program outlays and $10,000,000 of all program or activity payments made during the fiscal year reported; or 2) $100,000,000). Therefore, HUD is not required to report corrective actions for this program. However, in FY 2018, the program's estimated improper payments were above the statutory threshold and Ginnie Mae began implementing corrective actions for this program. Given the significant improvement in the improper payment rate, Ginnie Mae's corrective actions are summarized below.

In FY 2018, the program's improper payment findings related solely to insufficient documentation. In order to address this root cause, Ginnie Mae began developing an improved method of verifying invoices for their mortgage sub-servicers, which includes reviewing and approving documentation related to billed reimbursable costs. Ginnie Mae has documented the current process related to invoice review and Contracting Officer Representative (COR) approval, disbursement voucher package creation and the vendor management process and controls. In addition, a statistical sampling methodology will be implemented in the future in order to review the large number of underlying invoices related to mortgage sub-servicer reimbursable costs.

In order to reduce the risk of improper payments, Ginnie Mae has also conducted mandatory COR training sessions and added a COR Advocate to the staff. The COR Advocate works closely with all CORs and serves as a senior analyst and acquisition advisor to program subject matter experts regarding acquisition matters related to Departmental programs. The COR Advocate provides acquisition technical assistance and monitoring in support of the coordination, planning, negotiation, award, and administration of numerous procurement actions.

FHA – SFIC

The improper payments estimated for the FHA – SFIC program do not exceed the statutory thresholds listed in OMB *Circular A-123, Appendix C, Part I.B.1* (improper payments exceeding either: 1) both 1.5 percent of program outlays and $10,000,000 of all program or activity payments made during the fiscal year reported; or 2) $100,000,000). Therefore, HUD does not report corrective actions for this program.

Rental Housing Assistance Program (RHAP) – Tenant-Based Rental Assistance, RHAP – Project-Based Rental Assistance

HUD is in the process of developing an improper payment estimation methodology for these two programs. Improper payment testing was not performed for these programs in FY 2019; therefore, corrective actions were not established.

Recapture of Improper Payments Reporting

OMB *Circular A-123, Appendix C, Part III.C* requires agencies to conduct payment recapture audits, when applicable, for all programs and activities that expend $1 million or more annually, if cost effective. The payment recapture audit plan should describe any current or planned efforts to recover and prevent future improper payments. Programs may be excluded from a payment recapture audit if the agency has determined that such efforts will not be cost-effective. However, these programs must provide a justification and a summary of the analysis supporting their determination.

HUD identified 58 programs that disbursed $1 million or more in FY 2018. Of these, 17 programs have a payment recapture audit plan described in the section below. In addition, these programs are required to provide the conditions that led to improper payments. For the remaining 41 programs, HUD has determined that it would not be cost effective to execute a payment recapture audit. The cost-benefit analysis provided for the 41 remaining programs can be found in the Justifications for Programs Excluded section.

Programs with Payment Recapture Audit Plans

Program	Allotment Holder
Community Development Block Grant (CDBG) – *Disaster Relief Appropriation Act (DRAA)* Sandy	CPD

CPD's CDBG – *DRAA*-Sandy program monitors disaster recovery activities for Federally declared disaster areas effected by Hurricane Sandy. Periodic reports submitted by the grantee are reviewed at the field offices or at HUD headquarters. The grantee submits a periodic report using the Disaster Recovery Grant Reporting system. CPD also monitors the grantee's efforts to prevent the duplication of benefits. CPD program exhibit 6-9 – Disaster Recovery CDBG – Supplemental Grants serves the purpose of capturing improper payments identified in financial management and program file-level reviews during on-site monitoring visits. If any improper payments are identified they must include the voucher number, amount, type of improper payment and the corrective action. In most cases, CPD will recapture overpayments by offsetting future grants. If no future grants will be awarded to the grantee, HUD instructs the grantee to either repay their local program accounts or Treasury's account if the period has expired. CPD programs could also withhold additional funding until the overpayment has been recovered.

Condition

The condition that led to improper payments that were identified and recovered was the general nature of the appropriations. The *DRAA* (Sandy) supplemental appropriations are subject to national standards of a very general nature, none of which govern the levels of payment or set any rules through which payments can be judged as proper or improper.

Program	Allotment Holder
Salaries and Expenses	ADMN, CFO, CIO, CPD, CPO, FHEO, Ginnie Mae, HSNG, OCFO, OCHCO, OCIO, PDR, PIH

The Office of the Chief Human Capital Officer (OCHCO) manages HUD's Salaries and expenses (S&E), Transit Subsidy, and Purchase Charge Card Program payments. For payroll, OCHCO reviews the payroll report every pay period to make sure the burn rate is consistent with the previous pay period. If any improper payment was made, OCHCO then takes the necessary action(s) to rectify the mistake. For example, OCHCO collaborates with the OCFO and Treasury's Bureau of the Fiscal Service (BFS) to run all the necessary reports from WebTA, Treasury's Administrative Resource Center's (ARC) Oracle Financial System, and the Department of Agriculture's National Finance Center (NFC) to determine where the discrepancy was made. Once the source has been identified, OCHCO corrects the issue or determines if it is feasible to correct the improper payment. Through the Payroll, Benefits, and Retirement Division's (PBRD) quality review process, overpayments are identified and validated. Once validated and corrected through the NFC database, the debt is generated, and the employee is notified of the indebtedness. After due process, the collection process is initiated.

Across all program offices, all purchase cardholders/Administrative Officers are required to reconcile their own statements which includes individual purchases made during that month. Where there are discrepancies, (e.g., vendor overcharges, unknown charges, etc.), the cardholder shall contact the vendor directly for a refund. The cardholder can also dispute the charge with Citibank to obtain a credit.

Condition

No improper payments were identified in FY 2018. Therefore, no condition that leads to improper payments exists.

Program	Allotment Holder
Lead Hazard Reduction	OLHCHH

During grant execution, OLHCHH reviews the grantee's invoice, voucher and supporting documentation. If an improper payment is identified, the COR or Certified Occupancy Specialist (COS), as applicable, provides the funds recipient with documentation of the determination of the improper payment, the regulatory, grant-specific, and/or contractual basis for recovering the improper payment, a due date for recoupment, and a due-process opportunity to appeal. The appeal, if made, goes to the Grants Division Director (for grants) or Deputy Director of the Office (for contracts), as applicable. Should the request not be appealed, or the appeal denied, and the funding recipient did not refund the improper payment, the matter would be referred to the Office of General Counsel for action.

During the close-out of a grant, if it is determined that a financial error occurred, the grantee is asked to provide an explanation of the problem and, if required by the COR, the grantee submits a check to resolve the financial shortfall. The COR forwards the check and letter of explanation to the Budget Officer for recapturing funds, including a copy of the check and letter of explanation with the close-out package to the Grant Officer. The Grant Officer documents returned funds on form HUD 1044 (Assistance Award/Assistance). OLHCHH's process assures quality spending and monitoring for reimbursable funding.

The risks of improper reimbursements are low due to several reasons. OLHCHH is a reimbursement program; the funds distributed are for services that have already been completed and invoiced. Additionally, every three months, grantees submit information on work performed and provide a financial statement using the SF425, HUD-Part 3, and supporting documentation. The SF425, HUD-Part 3 and form HUD-27053 must match data in the Line of Credit Control System (LOCCS) and all totals must be the same. Under remote monitoring, a COR performs a review to ensure accuracy, as needed. On-site monitoring is conducted once a year after risk analysis is completed and/or high-risk is determined for each grantee. Poor performing grantees are required to submit weekly or monthly reports.

Condition

The condition that led to the identified and recaptured improper payments was incorrect documentation which was submitted by grantees and was then accepted by CORs and Contract Officers (CO). This was corrected by providing training to CORs and COs.

Program	Allotment Holder
Contracts/Grants (includes Single Family Upfront Grants)	Office of Housing-Federal Housing Administration (HSNG-FHA)
Federal Finance Bank Direct Loans	
Home Equity Conversion Mortgage Claims	
Home Equity Conversion Mortgage Notes	
Multi-Family Insurance Claims	
Multi-Family Notes	
Multi-Family Premium Refunds	
Multi-Family Property	
Other Disbursements	
Single Family Claims	
Single Family Premium Refunds - Distributive Shares and Refund System	
Single Family Property	
Title I Claims	
Title I Notes	

FHA's recovery audit program is part of its overall program of effective internal control over payments. Internal control policies and procedures establish a system to monitor improper payments and their causes, and includes controls and actions for preventing, detecting, and recovering improper payments. In addition to implementing the controls established by FHA, programs have taken specific actions to develop and regularly generate a report that identifies potential duplicate disbursements, researching the questionable disbursements and initiating recovery actions for payments deemed to be improper. As part of the recapture audit plan, internal control documents and files are reviewed, and post claim reviews are performed.

Under Direct Debt Collection, the Financial Operation Center (FOC) is primarily responsible for Generic Debt collection and customer service activities, including responding to debtor inquiries regarding pay-off, payment plans, compromises, disputes and appeals.

The Debt Referral Package primarily consists of copies of legal documents, mortgages, deeds of trust, judgments and other recorded lien documents, lien assignment documents, repayment agreements, credit reports, correspondence to/from debtors, and compromise agreements and supporting documents. The Debt Collection Asset Management System (DCAMS) is the application used to support the Generic Debt collection process. DCAMS is designed to automatically send collection letters, report delinquent debt to Credit Bureaus and HUD's Credit Alert Interactive Voice Response System (CAIVRS), assess penalties and administrative costs, and refer eligible debts to the Treasury Offset Program (TOP) and cross-servicing based on predefined criteria and the status of that case as reflected in DCAMS data fields (not later than 180 days after the demand letter). DCAMS is consistently updated to prevent improper referral for TOP offset.

For Internal Offsets, over-claimed amounts (negative claims) occur when the mortgagee owes FHA. The Single-Family Claims Branch (SFCB) sends billing letters to lenders for the excess amounts claimed and tracks the receivables using the Accounts Receivables Sub-system (ARS). Receivables are established in SFCB's ARS and identified by FHA case number. Each FHA case number is further identified by Section of the *Act* (which is linked to the appropriate fund) and endorsement date. This later date identifies the cohort year. The Holder of record to which the claim funds were originally disbursed is identified in ARS as the debtor, by default. When the receivable is subsequently liquidated by funds remitted by a Mortgagee or by offset, the collected amount is posted to the previously identified FHA case number, Section of the Act, and cohort year.

If a payment is not received from a lender within 90 days, the receivable is offset against subsequent claims by the lender until the full amount of the receivable is satisfied. If a receivable is not satisfied within 120-150 days, it is referred to the FOC in Albany, NY, for enforced collection actions. At that time, the FOC officially confirms acceptance of the transfer of an aged, delinquent debt, and that receivable has been removed from the ARS with the notation that it has been referred to FOC for recovery.

Another avenue by which improper payments are recaptured is through Post Claim Reviews. A statistical sample of settled claims is reviewed for compliance with FHA servicing and claim filing requirements. A report of findings, both monetary and financial, is prepared and issued to the individual mortgagee. Mortgagees have two opportunities to refute the findings by providing additional documents before a final report is issued. If the Mortgagee chooses to pay the monetary findings prior to HUD's issuance of the final report, those funds are deposited to ARS, which applies them to the Mortgage Insurance (MI) fund. Upon issuance of the final report, it is referred to the FOC which establishes it as a receivable and tracks it until paid in full.

If a lender is overpaid on a multifamily claim, the Multifamily Claims Branch will demand the overage back from the lender. If the lender fails to respond to their demands, the debt is referred to the FOC for collection.

Finally, for Treasury cross-servicing, the collection of Generic Debt is governed by the *Debt Collection Improvement Act* and HUD policies (Title I and Other Debt Collection Guidance 4740.2). The *Act* requires Federal agencies to refer eligible delinquent debts to Treasury (for cross-servicing and TOP) when the debt is 120 days delinquent.
The Treasury's TOP allows Federal Agencies to report delinquent non-tax debt to the BFS. BFS performs computer matching with disbursement data and processes an

offset when an appropriate match is determined. After referral, Treasury and its private collection agencies are responsible for contacting the debtor to collect the payment of the debt.

The Treasury's cross-servicing is a process used by BFS to refer the debt collection to a private collection agency, among other actions, to collect delinquent debts on behalf of Federal Agencies.

FOC's recapture process establishes receivables in DCAMS and issues a demand notice to the debtor(s). If the debt remains unpaid, DCAMS issues a "Notice of Intent" warning regarding enforced collection measures and informs the debtor regarding their due process rights. DCAMS automatically reports information to credit bureaus and CAIVRS. Penalty and administrative cost charges are also automatically assessed if warranted.

If the debt remains unpaid, it is referred to Treasury (within 180 days) for offset via the government-wide TOP and for direct collection action by Treasury and Treasury contracted private collection agencies. Treasury also initiates referral to the Department of Justice (DOJ) for civil litigation and/or initiates Administrative Wage Garnishment (AWG) action if they deem such action to be appropriate.

If Treasury's cross-servicing action is not successful, Treasury "returns" the debt to the FOC. If older than two years, the receivable is written-off and the case is reclassified "currently not collectible." The FOC keeps the case open if offset via TOP appears fruitful or if other collection measures are applicable (e.g., AWG action by HUD). Otherwise, the FOC terminates collection action, closes the case, and the system issues an IRS Form 1099C "Cancellation of Debt," the following January if appropriate. Write-off, Termination, close-out, and 1099C issuance can also occur at any point in the above collection cycle if determined appropriate (e.g., debtor is discharged as bankrupt).

Collections from debtors to HUD go to the Treasury Lockbox Network or Pay.gov. Collections from debtors to Treasury or DOJ come to HUD via interagency transfer (i.e., IPAC). No matter the route, all payments are posted to the receivable in DCAMS.

Condition

Several conditions have led to improper payments, one of which is a lack of compliance with underwriting requirements. This condition was corrected by taking steps to strengthen controls over the underwriting process, through the implementation of a Loan Review System (LRS). Lenders interact with FHA through the LRS for most of FHA's quality control processes, including post-endorsement loan reviews, Direct Endorsement test cases, lender monitoring reviews, and self-reporting of fraud and violations of FHA policy. This consolidation of multiple quality control processes into a single, unified system allows FHA to better organize and track its interactions with lenders on these critical issues, and significantly enhances loan quality reporting and analytics. It also helps FHA to better manage its quality control processes and quickly identify risks to its portfolio. Additionally, FHA continues to improve the post claims review function by strengthening internal controls to ensure SF Claim payments are accurate and supported. FHA has assigned additional staff members to the post claims team, procured a statistical sampling contractor with clarified guidance regarding the responsibilities of Post Claims Reviews. The post claims review team has also coordinated reviews with SF Housing staff to increase knowledge.

Justification for Programs Excluded from a Payment Recapture Audit

Grouped Programs

Of the 41 remaining programs, 32 were placed into five groups based on the nature of the program, lack of empirical evidence that would suggest significant improper payments or that programs had similar overpayment recovery activities. Refer to the “Individual Programs” sub-section for the remaining nine programs. The 32 programs were grouped as follows:

- Group 1 – Similar Overpayment Recovery Activities (15 programs)
- Group 2 – Nature of the Program (2 programs)
- Group 3 – Lack of Empirical Evidence (7 programs)
- Group 4 – Similar Overpayment Recovery Activities (4 programs)
- Group 5 – Similar Overpayment Recovery Activities (4 programs)

Group 1 – Similar Overpayment Recovery Activities	
Program	**Allotment Holder**
Appalachian Regional Commission (ARC) Projects	CPD
Brownfields Redevelopment	
Capacity Building	
Community Development Block Grant -CDBG Insular Areas -CDBG Entitlement -CDBG Non-Entitlement	
Community Development Fund - Disaster Recovery Assistance (Hurricane Harvey, Irma, Maria)	
Community Development Fund - Disaster Recovery Assistance (Louisiana, Texas, West Virginia, Hurricane IKE, Other Disasters)	
Community Development Loan Guarantees – Section 108	
Congressional Earmarks – Economic Development Initiative – Special Projects/Neighborhood Initiatives	
HOME Investments Partnership Program	
Homeless Assistance Grants	
Housing Opportunities for Persons with AIDS	
Housing Trust Fund	
Neighborhood Stabilization Program	
Project-Based Section 8 Renewal of Expiring Sec. 8 Mod Rehab SRO	
Self-Help Homeowner Opportunity Program (SHOP)	

Justification

These CPD programs have a monitoring process in place to assess the quality of performance of the grantee over time and promptly resolve the findings of audits and other reviews. Monitoring provides information about program participants that is critical for making informed judgments about program effectiveness and management efficiency. It also helps in identifying instances of fraud, waste and abuse. The process involves frequent telephone/email contacts, written communications, analysis of reports and audits, and periodic meetings. Monitoring also provides opportunities to identify program participant accomplishments as well as successful management/ implementation/evaluation techniques that might be replicated by other CPD program participants.

CPD's program exhibit 341 *Guide for Review of Financial Management and Audits* is designed to monitor non-federal entity's compliance with requirements of *Subparts D* and *F* of *2 CFR part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. During the monitoring process, program expenditures are reviewed to determine if improper payments were made. If identified CPD determines if the appropriate corrective actions took place. In most cases, CPD will recapture overpayments by offsetting future grants. If no future grants will be awarded to the grantee, HUD will instruct the grantee to either repay their local program accounts or Treasury's account if the period has expired. CPD programs could also withhold additional funding until the overpayment has been recovered.

Implementing a payment recapture audit program could duplicate the process in place. In addition, the results of HUD's IPERIA risk assessment identified these programs as not susceptible to significant improper payments. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Group 2 – Nature of the Program	
Program	**Allotment Holder**
RHAP – Project-Based Rental Assistance RHAP – Project-Based Section 8 -Rental Housing Assistance Program – Section 236 -Housing for Persons with Disability – Section 811	HSNG-MFH
RHAP – Tenant Based Rental Assistance Section 8 Housing Certificate Fund & Tenant Based Rental Assistance	PIH

Justification

A payment recapture audit would not be cost-beneficial based on the nature of these programs. Collectability is a concern as tenants may no longer be receiving housing assistance when the overpayment is identified, or many may not be able to repay the over-subsidy with their own resources. Owners/PHAs use the Enterprise Income Verification (EIV) system to verify tenant employment/income information and reduce administrative and subsidy payment errors in accordance with HUD administrative guidance. The program POCs use EIV to monitor the owner's compliance with access and use of the system. However, tenant files are stored locally at each multifamily property and some RHAP activities are administered by PHAs nationwide. A recovery audit would involve substantial travel costs in addition to staff time. There is also no centralized computer database capturing documents used to support the rental subsidy determinations. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Group 3 – Lack of Empirical Evidence	
Program	**Allotment Holder**
Choice Neighborhoods Initiative	PIH
Family Self-Sufficiency Program	
Public Housing Capital Fund	
Public Housing Operating Fund	
Revitalization of Severely Distressed Public Housing (HOPE VI)	
Section 811 Housing for Persons with Disabilities (PRAC and Capital Advance)	HSNG-MFH
Research and Technology	PDR

Justification

The results of HUD's IPERIA risk assessment identified these programs as not susceptible to significant improper payments. There is no empirical evidence, either through IPERIA risk assessments, *A-123* internal control reviews, and other monitoring reviews, suggesting that significant improper payments exist within these programs and activities, it is not likely that HUD would realize any benefit to payment recapture audits of these programs. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Group 4 – Similar Overpayment Recovery Activities	
Program	**Allotment Holder**
Contractor Payments	Ginnie Mae
Master Sub-Servicer (MSS) Default Activity	
Refunds Program	
Soldiers' and Sailors' Civil Relief Act (SSCRA) Program Reimbursement and Multifamily 1% Reimbursement Program	

Justification

Any overpayments identified will offset future payments to the contractor. However, if there are no future invoices to be provided, Ginnie Mae will request reimbursement for the improper payment. To recover overpayments made to the General Services Administration (GSA) for invoice payments to a vendor, Ginnie Mae will process an IPAC. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Group 5 – Similar Overpayment Recovery Activities	
Program	**Allotment Holder**
Housing for Special PopulationsCapital Advance portion of expenditures, Section 202	HSNG
Project-Based Rental Assistance Section 8 Moderate Rehabilitation	PIH
Rental Housing Assistance Program – Section 236	HSNG
Rent Supplement	HSNG-MFH

Justification

The results of HUD's IPERIA risk assessment identified these programs as not susceptible to significant improper payments. All owners receiving funding from these programs are mandated by *24 CFR 5.233* to fully utilize the EIV system. The EIV system is a web-based application which provides owners with employment, wage, unemployment compensation and social security benefit information for tenants participating in HUD's assisted housing programs. Tenant Rental Assistance Certification System (TRACS) is a financial management system developed to improve the fiscal control over assisted housing programs and acts as the sole repository of all tenant certification data, assistance contract data and crucial payment data. EIV is matched against TRACS and a variance of $2,400 per year generates an error and owners are required to follow-up with the tenant and resolve the error. If an overpayment is identified, tenants may pay the owner in a lump sum or by entering into a repayment agreement. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Individual Programs

The remaining nine programs have other mechanisms in place to recover overpayments.

Program	Allotment Holder
Fair Housing Assistance Program (FHAP)	FHEO

Justification

A payment recapture audit could possibly yield a negative return as disbursements to the grantee are made under grants and fixed amount cooperative agreements. Guidance is issued annually that outlines how payments will be made for the year. Funds to grantees are for reimbursements of work already performed. Each case submitted for reimbursement is reviewed. However, if an overpayment is identified, the FHAP Division would have the grantee send a refund to the HUDFAD Collections account at the US Bank, which is successful at recovering overpayments. Furthermore, the results of HUD’s IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Fair Housing Initiative Program	FHEO

Justification

There are monitoring processes in place to ensure a grantee complies with the terms and conditions of the award. The process involves frequent telephone/email contacts, written communications, analysis of program and financial reports, and periodic meetings. HUD reserves the right to withhold future payments if the grantee fails to comply with the terms of the grant. Any erroneous payments made by the grantee must be refunded to HUD. Funds can be returned electronically or by check. Furthermore, the results of HUD’s IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Housing Counseling Assistance	HSNG

Justification

The Housing Counseling Assistance program utilizes staff and assistance from contractors to identify agencies that have received overpayments and amounts. This team supports the justification for their assertion and recover the amount owed. Overpayments are identified using tools contained in Microsoft Excel and InfoPath. Furthermore, the results of HUD’s IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Manufactured Housing (MH)	HSNG

Justification

Overpayments are significantly rare as funds are automatically calculated based on the monthly production and shipment of manufactured homes. When overpayments are made to Contractors that provide support to the MH program, the COR contacts the CO to recapture funds. When overpayments are made to state partners (state-administered programs), the overpayment is documented, and the adjustment or recapture of the funds is made the following month. Furthermore, the results of HUD's IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Office of the Chief Procurement Officer Payments to Federal Contractors	OCPO

Justification

Overpayments identified in this program can be recovered in one of four ways. OCPO can request the vendor to remit refunds to the government via check or other payment method. In a second approach, OCPO can recover the overpayment amount by reducing the payment on the next invoice for the same contract. Another recovery method is by offsetting on another contract held by the contractor with the agency. Lastly, they could offset on any contract held by the contractor government-wide. The results of HUD's IPERIA risk assessment identified these programs as not susceptible to significant improper payments. Implementing a payment recapture audit program would duplicate any of the processes currently in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Indian Community Development Block Grants	PIH

Justification

The Indian Community Development Block Grants program has several levels of review in each area Office of Native American Program location to assure the grant award matches the amount on the grant agreement. However, if an overpayment was discovered, the program would notify the recipient and request the return of the overpayment. There has been no occurrence of an overpayment to date. Furthermore, the results of HUD's IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place.

Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Native American Housing Block Grants	PIH

Justification

Overpayments are identified through manual reviews of paper documentation. Once identified, the recipient is notified and requested to return the overpayment. In most cases the recipient of the overpayment agrees to return the overpayment or permits HUD to recover the overpayment through offset of future grants over time. Furthermore, the results of HUD's IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
NHHBG	PIH

Justification

This grant program has a single grantee and has not had an overpayment. However, should an overpayment occur, the relationship with the single grantee is such that the recipient would voluntarily return the funding. The cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered. Furthermore, the results of HUD's IPERIA risk assessment identified this program at low risk of significant improper payments. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

Program	Allotment Holder
Native Hawaiian Housing and Indian Home Loan Guarantee Sec. 184 Program Account	PIH

Justification

Payments are only made to Section 184 Approved Lenders. If an overpayment is discovered, the Office of Loan Guarantee (OLG) advises the lender of the overpayment and the lender remits overpaid funds to OLG. Because a lender must be approved to participate in the program, lenders are cooperative in accessing the overpayment amount and repaying any amount to which they are not entitled. Furthermore, the results of HUD's IPERIA risk assessment identified this program to be at low risk of significant improper payments. Implementing a payment recapture audit program would duplicate the process in place. Therefore, the cost of any additional attempts to recover improper payments would exceed the benefit of improper payments recovered.

FY 2019 Overpayment Recapture Amounts

Overpayments Recaptured through Payment Recapture Audits – FY 2019 (Dollars in Millions)				
Program or Activity	**Amount Identified**	**Amount Recaptured**	**Recapture Rate**	**Recapture Rate Target**
CDBG – DRAA-Sandy	$7.34	$0.01	0%	75%
Lead Hazard Reduction	$0.25	$0.25	100%	75%
Office of Housing-FHA	$3.67	$2.48	67%	25%
Salaries and Expenses	-	-	-	-

Overpayments Recaptured outside of Payment Recapture Audits – FY 2019 (Dollars in Millions)			
Program or Activity	**Amount Identified**	**Amount Recaptured**	**Recapture Rate**
CPD	$36.66	$19.22	52%
Deputy Secretary	-	$0.02	N/A[51]
Ginnie Mae	$0.56	$0.36	64%
Housing	$55.60	$39.06	70%
Lead Hazard Reduction	$2.55	-	-
Office of Housing-FHA	$0.46	$0.26	57%
OCPO	$0.02	$8.16	N/A[52]
OGC	$115.12	$115.81	101%[53]
PIH	$53.78	$14.46	27%

[51] Amount recaptured in reporting period was identified in a prior period.
[52] *Ibid*.
[53] *Ibid*.

Disposition of Amounts Recaptured Through Payment Recapture Audits – FY 2019 (Dollars in Millions)							
Program Name	**Amount Recaptured**	**Agency Expenses to Administer the Program**	**Payment Recapture Auditor Fees**	**Financial Management Improvement Activities**	**Original Purpose**	**OIG**	**Returned to Treasury**
CDBG – DRAA Sandy	$0.01	-	-	-	$0.01	-	-
Lead Hazard Reduction	$0.25	-	-	-	-	-	$0.25
Office of Housing FHA	$2.48	-	-	-	2.48	-	-
Salaries and Expense	-	-	-	-	-	-	-

Aging of Outstanding Overpayments identified in the Payment Recapture Audits (Dollars in Millions)				
Amount Outstanding 0 – 6 Months				
Program or Activity	**Cumulative Amount Identified (Dollars)**	**0 – 6 months (Dollars)**	**0 – 6 months Percent (of program)**	**0 – 6 months Percent (of agency)**
CDBG – DRAA-Sandy	$7.34	-	-	-
Lead Hazard Reduction	-	-	-	-
Office of Housing-FHA	$4.74	$2.76	58%	23%
Salaries and Expense	-	-	-	-

Aging of Outstanding Overpayments identified in the Payment Recapture Audits (Dollars in Millions)				
Amount Outstanding 6 Months – 1 Year				
Program or Activity	**Cumulative Amount Identified (Dollars)**	**6 months to 1 year (Dollars)**	**6 months to 1 year Percent (of program)**	**6 months to 1 year Percent (of agency)**
CDBG – DRAA Sandy	$7.34	$7.34	100%	61%
Lead Hazard Reduction	-	-	-	-
Office of Housing-FHA	$4.74	$0.92	19%	8%
Salaries and Expense	-	-	-	-

Aging of Outstanding Overpayments identified in the Payment Recapture Audits (Dollars in Millions)				
Amount Outstanding Over 1 Year				
Program or Activity	**Cumulative Amount Identified (Dollars)**	**Over 1 year (Dollars)**	**Over 1 year Percent (of program)**	**Over 1 year Percent (of agency)**
CDBG – DRAA-Sandy	$7.34	-	-	-
Lead Hazard Reduction	-	-	-	-
Office of Housing-FHA	$4.74	$1.07	23%	9%
Salaries and Expense	-	-	-	-

Aging of Outstanding Overpayments identified in the Payment Recapture Audits (Dollars in Millions)				
Amount Outstanding Determined Not to Be Collectible				
Program or Activity	**Cumulative Amount Identified (Dollars)**	**Determined to not be collectible (Dollars)**	**Determined to not be collectible Percent (of program)**	**Determined to not be collectible Percent (of agency)**
CDBG – DRAA-Sandy	$7.34	-	-	-
Lead Hazard Reduction	-	-	-	-
Office of Housing-FHA	$4.74	-	-	-
Salaries and Expense	-	-	-	-

Agency Improvement of Payment Accuracy with the Do Not Pay Initiative

The Do Not Pay Initiative (DNP) was established by IPERIA to support Federal agencies in their efforts to detect and prevent improper payments. DNP helps to protect the integrity of the Federal government's payment processes by assisting agencies in mitigating and eliminating improper payments in a cost-effective manner while safeguarding the privacy of individuals. DNP enables agencies to use a secure online interface to check various data sources to verify eligibility of a vendor, grantee, loan recipient, or beneficiary to receive Federal payments. DNP enables agencies to screen payment recipients on a prepayment basis against databases identified in IPERIA, and also provides post-payment screening against these databases to help ensure that any payments to potentially ineligible parties are identified for adjudication and possible recovery.

During FY 2019, HUD screened 696,000 payments against IPERIA-listed databases, representing $60 billion.[54] Of these, four potential improper payments were identified. These matches were properly adjudicated in the DNP Portal and determined to be proper payments.

The effectiveness of the DNP post payment review of data, coupled with program specific pre-payment monitoring and screening of payments to prevent payments to ineligible parties, has resulted in an observed ineligible party payment rate of 0 percent. Management will continue to emphasize review and monitoring of established internal controls to prevent any future improper payments. HUD continues to have discussions with Treasury to determine the most beneficial way to monitor its programs through the Do Not Pay Initiative.

[54] As of publication of this report, the available payment data on the Do Not Pay Portal was through July 2019.

Barriers

Ginnie Mae Contractor Payments, FHA – SFIC

Ginnie Mae Contractor Payments and FHA – SFIC reported estimated improper payments below the statutory threshold of 1.5 percent of program outlays and $10,000,000 or $100,000,000. Therefore, reporting statutory or regulatory barriers that may limit corrective actions in reducing improper payments is not applicable.

RHAP – Tenant-Based Rental Assistance, RHAP – Project-Based Rental Assistance

HUD did not estimate improper payments for these programs in FY 2019. Therefore, reporting statutory or regulatory barriers that may limit corrective actions in reducing improper payments is not applicable.

Accountability

Ginnie Mae Contractor Payments, FHA – SFIC

Ginnie Mae Contractor Payments and FHA – SFIC reported estimated improper payments below the statutory threshold of 1.5 percent of program outlays and $10,000,000 or $100,000,000. Therefore, reporting accountability actions for reducing and recapturing improper payments through annual performance appraisal criteria is not applicable.

RHAP – Tenant-Based Rental Assistance, RHAP – Project-Based Rental Assistance

HUD did not estimate improper payments for these programs in FY 2019. Therefore, reporting accountability actions for reducing and recapturing improper payments through annual performance appraisal criteria is not applicable.

Agency Information Systems and Other Infrastructure

Ginnie Mae Contractor Payments, FHA – SFIC

Ginnie Mae Contractor Payments and FHA – SFIC reported estimated improper payments below the statutory threshold of 1.5 percent of program outlays and $10,000,000 or $100,000,000. Therefore, reporting whether the agency has the internal controls, human capital, information systems and other infrastructure it needs to reduce improper payments to the levels the agency has targeted is not applicable.

RHAP – Tenant-Based Rental Assistance, RHAP – Project-Based Rental Assistance

HUD did not estimate improper payments for these programs in FY 2019. Therefore, reporting whether the agency has the internal controls, human capital, information systems and other infrastructure it needs to reduce improper payments to the levels the agency has targeted is not applicable.

Sampling and Estimation

Ginnie Mae Contractor Payments

HUD estimated improper payments for this program using a statistically valid and rigorous estimation methodology. HUD obtained a population of cash disbursements for Ginnie Mae Contractor Payments covering the FY 2018 period from October 1, 2017 through September 30, 2018, provided in an electronic data file.

A stratified random sampling methodology was utilized in order to select a representative statistical sample from the cash disbursements population. The transactions were first stratified by Supplier (Mortgage Sub-Servicers and Others) then by payment amount.[55] HUD calculated the overall sample size needed to achieve a precision of 3 percent at the 95 percent confidence level consistent with guidance found in OMB *Circular A-123, Appendix C*. This resulted in an overall sample size of 267 for the cash disbursement population.

The sample size was allocated to the strata based on Neyman allocation, targeting a minimum sample size of 30 for each sampled stratum.[56] Random numbers were assigned to each transaction in the sampling frame, and the sample was selected based on the ordered randomized transactions within each stratum. The table on the next page provides a summary of the sample design.

[55] Last year, the population was only stratified by payment amount. During testing, it was discovered that Mortgage SubServicer contracts included unique contract terms that did not occur for other suppliers. As such, additional stratification was utilized to avoid projecting errors related to these specific contract terms to other suppliers.

[56] The minimum sample size target of 30 per stratum does not apply to stratum 5, as there are only 19 payments in this stratum and all were selected for review. During the payment review, three payments (one each from strata 2, 3, and 4) were determined to have been subsequently cancelled and excluded from the sample. These samples were not replaced as an assessment of the remaining sample size indicated it was not statistically necessary. Therefore, stratums 2 and 4 fell below the target of 30 sampled per stratum.

Supplier Group	Stratum Number	Min	Max	Population Size	Population Amount	Sample Size	Sample Amount
Mortgage Sub-Servicers	1	$0.23	$15,757.25	2,313	$2,970,851.45	30	$35,501.69
	2	$15,847.52	$135,595.70	181	$8,349,949.55	29	$1,410,973.77
	3	$146,338.75	$502,080.30	54	$16,274,767.27	34	$10,533,391.75
	4	$507,516.30	$989,972.66	38	$28,229,484.57	29	$21,101,007.83
	5	$1,027,207.19	$2,371,496.93	19	$28,706,827.37	19	$28,706,827.37
Others	6	$5.82	$55,715.72	423	$4,201,558.88	30	$320,955.53
	7	$57,840.30	$216,079.93	95	$12,916,585.30	30	$4,395,208.82
	8	$220,681.49	$668,936.24	46	$14,306,153.84	30	$9,167,318.07
	9	$719,198.02	$2,021,847.41	36	$38,550,129.45	36	$38,550,129.45
Total				**3,205**	**$154,506,307.68**	**267**	**$114,221,314.28**

Error rates were extrapolated based on the sample findings over the entire population. A stratified separate ratio estimator was used to extrapolate the total error rate. A ratio was computed that was defined as the total error amount found in the sample over the total recorded dollar amount in the sample of the stratum. Within each stratum, the ratio of error amount was multiplied by the total recorded dollar amount in that stratum to project the total error amount for that stratum. The overall projected error amount for that particular type of error for the entire population is the sum of the stratum-specific projected error amount for all strata. HUD's use of the separate ratio estimation methodology for a stratified random sample is consistent with the approach documented and executed in the prior year.

FHA – SFIC

In FY 2019, HUD received OMB approval to estimate improper payments in the program using a non-statistically valid plan, which is the best use of HUD resources to achieve program objectives while also estimating potential improper payments as HUD leverages the already established post-claim review process.

As part of the post-claim review process, HUD targeted the highest risk lenders with claim disbursements in FY 2018 and the preceding two years based on operational process deficiencies. The remaining population of lenders were subject to review given the available funding resources.

HUD then implemented a stratified random sampling approach to select claims for each of the targeted lenders. Strata were defined based on the claim type and high-risk identifier for the claims within each targeted lender. High-risk claims were isolated into their own stratum to ensure they were reviewed. Claims are deemed high risk due to documented operational deficiencies. HUD also considered further stratifying the claims by total claim amount (dollars) in order to separate claims into homogenous groups. Further, the claims population to be reviewed within each lender included only the relevant claim types that may be associated with improper payments. The sample size was a function of the total number of claims submitted by a lender during the review period. HUD identified an improper payment estimated error rate of SFIC payments for FY 2018 claims based on validated errors identified in the selected samples for the targeted lenders. Validated errors for claims paid identified during testing were extrapolated to the total amount of claims paid by the targeted lenders. HUD then extrapolated the improper payments identified in the sample to each targeted lender's population of claims (factoring in the stratification design and population weights within each stratum). The extrapolated errors for the targeted lenders (improper payments identified in claims paid) were used to determine the estimated error rate for the SFIC program.

RHAP – Tenant-Based Rental Assistance, RHAP – Project-Based Rental Assistance

HUD is in the process of developing statistically valid estimation methodologies for both RHAP – Tenant and Project-Based Rental Assistance. HUD plans to estimate and report on improper payments for these programs in FY 2020.

IPERIA Risk Assessment

In FY 2019, HUD updated its Risk Assessment Plan for recording and capturing qualitative risk assessment results. HUD has refined the accuracy of determining a program's risk factor rating from a subjective format to an objective format that weighs the significance of each risk factor assessed. HUD's Risk Assessment Plan is a step-by-step approach for determining if a risk assessment is required for the current FY and details the step-by-step process for completing an assessment.

Risk assessments are required to be conducted at least once every three years for programs/activities that were not deemed to be susceptible to significant improper payments. HUD conducted walkthrough meetings with program officials and other key stakeholders to discuss the purpose of the improper payment risk assessment, the risk assessment requirements, criteria and workbook template. Program offices considered eight risk factors for programs requiring an assessment as indicated in the table on the following page.

Improper Payment Risk Assessment Risk Factors	
Risk Factor	Description of Risk Factor
Newness of Program or Transactions	Whether the program or activity reviewed is new to the agency
Volume of Payments	The volume of annual payments
Complexity of Program or Transactions	The complexity of the program or activity to be reviewed, particularly with respect to determining correct payment amounts
Eligibility Determination and Disbursement Authority	Whether payments or payment eligibility decisions are made outside of the agency, for example, by a State or local government, or a regional Federal office
Changes in Program Funding, Authorities, Practices or Procedures	Recent major changes in program funding, authorities, practices, or procedures, including mechanisms by which payments are made to recipients
Human Capital Management	The level, experience, and quality of training for personnel responsible for making program eligibility determinations or certifying that payments are accurate
History of Audit Issues	The risk associated with the program's use of payment processing systems that have been identified as deficient or problematic through HUD OIG/GAO audit findings or internal HUD assessments.
History of Payment System Deficiencies	Significant deficiencies in the audit reports of the agency including, but not limited to the agency Office of Inspector General (OIG) or the Government Accountability Office (GAO) report audit findings; or other relevant management findings that might hinder accurate payment certification

If a program is determined to be high risk and susceptible to significant improper payments, HUD will coordinate with the relevant stakeholders to develop a methodology and estimate improper payments for the program. HUD conducted a total of 17 risk assessments for six program offices. Based on the results, no new programs were identified as high risk.

Fraud Reduction Report

In FY 2019, HUD continued the development of its Department-wide Enterprise and Fraud Risk Management (EFRM) Program in accordance with OMB *Circular A-123* and the *Fraud Reduction and Data Analytics Act* of 2015 (*FRDAA*). The focus of the EFRM Program centered on maturing a single integrated framework for risk and fraud management at HUD to identify, assess, manage, and report risks. HUD risk officers, stakeholders and business owners are working collectively across the organization to further mature enterprise and fraud risk management activities in the context of promoting the achievement of HUD's mission.

HUD's Chief Risk Officer (CRO) was integrated with OCFO in FY 2018 to manage, lead, and oversee the EFRM Program. In FY 2019, HUD's Risk Management Council (RMC), chaired by the Chief Financial Officer and comprised of senior leadership throughout the Department, was established to provide governance over the EFRM Program. The agency's goal in using the integrated governance structure focuses on improving mission delivery, gaining efficiencies, and focusing corrective actions toward key risks.

The EFRM Program was designed to integrate enterprise and fraud risks with HUD's strategy, budget, and performance processes to promote risk-based decision-making. Accordingly, strengthening EFRM has been identified as a major initiative of HUD's FY 2020 Annual Performance Plan in demonstrating leadership's commitment to EFRM. As part of HUD's FY 2021 Budget Formulation process, EFRM concepts were incorporated to support risk mitigation of HUD's top risks.

In FY 2019, the EFRM Program has seen continued integration of enterprise and fraud risk by disseminating further guidance on how to report fraud risks for the ERM risk profile submissions. HUD has continued to incorporate practices from the GAO *Fraud Risk Framework* and has structured its anti-fraud approach to align with the four phases of the GAO FRM life cycle: Commit, Assess, Design and Implement, and Evaluate and Adapt. As a whole, HUD has taken steps to establish financial and administrative anti-fraud controls as described by the FRDAA and perform fraud risk assessments over selected FRDAA process areas. The EFRM Program has developed foundational documents to guide the implementation of these FRM leading practices throughout the Department and outline roles and responsibilities. In addition, HUD's Index of Fraud Schemes was refreshed to incorporate emerging fraud risk areas of interest based on lessons learned and coordination with key stakeholders.

Fraud Risk Management has become a regular topic of conversation among existing leadership and risk management forums, including RMC and Risk Officer meetings, executive briefings, trainings, etc. New to FY 2019, the Fraud Analytics Working Group (FAWG) was established to convene risk, data, and program practitioners throughout the Department to apply analytical techniques and aid in identifying and addressing key enterprise and fraud risks. In pursuit of this effort, the EFRM program performed sentiment analysis on Single Audits for HUD grantees to determine a risk score and visualize historical compliance and reporting risk. As a result, the EFRM Program launched a proof of concept with a HUD program office to develop an analytical model for grantee risk indicators to inform risk-based oversight procedures. Looking forward to FY 2020, the EFRM program is planning to expand its analytic capabilities throughout the Department and continue implementing leading practices from GAO's *Fraud Risk Framework.*

The Enterprise Risk Process

The EFRM program identified several cross-cutting, enterprise risks based upon the FY 2017 and FY 2018 Risk Profile exercises. The RMC launched in April 2019, establishing a governing body for the identification, assessment and monitoring of HUD's enterprise risks. The EFRM program leveraged the RMC to identify the Department's priority risks for the FY 2019 performance period, which include the areas of Human Capital and Acquisitions. Once identified, the EFRM program facilitated four enterprise risk working groups during the summer of 2019, convening subject-matter experts from across the Department to provide root cause analysis and mitigation recommendations for the enterprise risks prioritized by the RMC.

Additional root-cause analyses and risk mitigation efforts – such as the Agency-wide Integrity Taskforce – are underway for many of other enterprise risks identified through the Risk Profile refresh, and the EFRM team is working closely with program offices and management to track mitigation responses. Specifically, the EFRM team is working to ensure that all programmatic and enterprise risks include proposed risk responses associated with one of the following categories:

- Risk and internal control assessment;
- Annual programmatic strategic review;
- Budget planning, formulation, and execution process; or
- Data-driven performance reviews.

The latest Risk Profile refresh was completed in June 2019 and included guidance on aligning new and previously identified risks to the new Strategic Plan and future budget requests, addressing gaps in the previous FY 2018 Risk Profile, and defining risk mitigation strategies.

Reduce the Footprint

Since FY 2013, HUD has experienced space reductions at 30 of its field offices and headquarters satellite locations, and the closing of 19 of our smallest field offices that duplicate HUD services in states with at least one other larger office.

HUD continues to focus on its footprint reductions by examining its Field and National Capital portfolios. In FY 2018, HUD reduced its footprint an additional 31,798 square feet for a savings of $2.6 million. These actions have resulted in a total reduction of 296.611 usable square feet and an annual estimated rent cost avoidance of over $10 million since FY 2013.

A significant challenge for HUD is that many of the locations we occupy were designed when there was a far greater staffing level. HUD has engaged with the General Services Administration to develop strategies to relinquish space that is no longer needed in a marketable fashion, so the space can be removed from HUD's inventory.

HUD developed new design standards, and these became effective in March 2016. The standards will enable HUD to work toward a target of 175 usable square feet per person for its overall portfolio. HUD does not own or direct lease any of its locations.

Reduce The Footprint Policy Baseline Comparison (Square Footage in Millions)			
	FY 2015 Baseline	**CY 2018**	**Change (FY 2015 Baseline CY 2018)**
Square Footage	3,098,523	2,970,865	(127,658)

Reporting OF O&M - Owned And Direct Lease Buildings (Dollars in Millions)			
	FY 2015 Reported Cost	**CY 2018**	**Change (FY 2015 Baseline CY 2018)**
Operation and Maintenance Costs	N/A	N/A	N/A

Civil Monetary Penalty Adjustment for Inflation

In compliance with *the Federal Civil Penalties Inflation Adjustment Act of 1990*, as amended, HUD has published in the Federal Register the adjustments for inflation of civil monetary penalties under its jurisdiction. The following table summarizes the current penalty levels, which were published in the Federal Register on March 15, 2019, with an effective date of April 15, 2019.

Statutory Authority	Penalty (Name or Description)	Year Penalty Enacted	Latest Year of Adjustment	Current Penalty Level	Location for Penalty Update Details
31 U.S.C. §3802(a)(1)	False Claims & Statements	1986	2019	$11,463	84 Fed. Reg. 9451 (April 15, 2019)
42 U.S.C. §3537a(c)	Advance Disclosure of Funding	1989	2019	$20,134	84 Fed. Reg. 9451 (April 15, 2019)
42 U.S.C. §3537a(c)	Disclosure of Subsidy Layering	1989	2019	$20,134	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §1735f–14(a)(2)	FHA Mortgagees and Lenders Violations	1989	2019	Per Violation: $10,067 Per Year: $2,013,399	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §v1735f–14(a)(2)	Other FHA Participants Violations	1997	2019	Per Violation: $10,067 Per Year: $2,013,399	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §1715z–13a(g)(2)	Indian Loan Mortgagees Violations	1992	2019	Per Violation: $10,067 Per Year: $2,013,399	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §1735f–15(c)(2)	Multifamily & Section 202 or 811 Owners Violations	1989	2019	$50,334	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §1723i(b)	Ginnie Mae Issuers & Custodians Violations	1989	2019	Per Violation: $10,067 Per Year: $2,013,399	84 Fed. Reg. 9451 (April 15, 2019)
12 U.S.C. §1703	Title I Broker & Dealers Violations	1989	2019	Per Violation: $10,067 Per Year: $2,013,399	84 Fed. Reg. 9452 (April 15, 2019)
42 U.S.C. §4852d(b)(1)	Lead Disclosure Violation	1992	2019	$17,834	84 Fed. Reg. 9452 (April 15, 2019)
42 U.S.C. §1437z–1(b)(2)	Section 8 Owners Violations	1997	2019	$39,121	84 Fed. Reg. 9452 (April 15, 2019)
31 U.S.C. §1352	Lobbying Violation	1989	2019	Min: $20,134 Max:$201,340	84 Fed. Reg. 9452 April 15, 2019)
42 U.S.C. §3612(g)(3)	Fair Housing Act Civil Penalties	1988	2019	No Priors: $21,039 One Prior: $52,596 Two or More Priors: $105,194	84 Fed. Reg. 9452 (April 15, 2019)
42 U.S.C. §5410	Manufactured Housing Regulations Violation	1974	2019	Per Violation: $2,924 Per Year: $3,654,955	84 Fed. Reg. 9452 (April 15, 2019)

Secretary's Audit Resolution Report to Congress

This information on the Department of Housing and Urban Development's audit resolution and follow-up activity covers the period October 1, 2018, through September 30, 2019. It is required by *Section 106* of the *Inspector General Act Amendments (Public Law 100504)*, and provides information on the status of audit recommendations with management decisions, but no final action. The report also furnishes statistics for FY 2019 on the total number of audit reports and dollar value for both disallowed costs and for recommendations that funds be put to better use.

Audit Resolution Highlights

Overall the Department achieved 608 approved management decisions and successfully implemented 730 recommendations. The Department also made good progress in reducing its inventory of potential significantly overdue final actions, which are those recommendations which could potentially be significantly overdue on September 30, 2019. This inventory was successfully addressed, and the Department resolved 205 recommendations in this category, which was a reduction of 33.0 percent.

Summary of Management Decisions On Audit Recommendations	
Opening Inventory Requiring Decisions	428
New Audit Recommendations Requiring Decisions	371
Management Decisions Made[57]	(608)
Audit Recommendations Still Requiring Decisions[58]	191
Recommendations Beyond Statutory Resolution Period[59]	48

[57] Management decisions were made on a total of 608 recommendations (83 audits of which 52 had final management decisions). Of these, 388 recommendations were in the opening inventory

[58] This reporting period ended with 191 recommendations without management decisions. Of these, 48 recommendations are over six months old.

[59] *Ibid*.

Summary of Recommendations With Management Decisions And No Final Action	
Opening Inventory – Final Actions Pending[60]	1698
Management Decisions Made During Report Period	608
Sub-Total Final Actions Pending	2306
Final Actions Taken[61]	(730)
Audit Recommendations Reopened During Period (Without Final Actions)	0
Total Audit Recommendations Still Requiring Final Actions[62]	1576

Management Report on Final Action On Audits With Disallowed Costs		
Audit Reports	**Number of Audit Reports**	**Questioned Costs**
A. Audit Reports with management decisions on which final action had not been taken at the beginning of the period.[63]	369	$3,604,092,122
B. Audit Reports on which management decisions were made during the period.	58	$1,258,719,939
C. Total audit reports pending final action during period (total of A and B)	427	$4,862,812,061
D. Audit Reports on which final action was taken during the period		
1. Recoveries[64]	52	$407,272,305
(a) Collections and offsets	52	$380,981,948
(b) Property	0	0
(c) Other	10	$26,290,357
2. Write-offs	41	$1,365,937,331
3. Total of 1 and 2[65]	63	$1,773,209,636
E. Audit Reports needing final action at the end of the period (subtract D3 from C)[66]	364	$3,089,602,425
F. Open recommendations with disallowed costs[67]	[783]	[$2,853,371,623]

[Please note that the Inspector General Act requires reporting at the audit report level versus the individual recommendation level. At the audit report level, total disallowed costs in the report are reported as open until all recommendations in a report are closed.]

[60] Opening inventory reflects five retroactive entries.
[61] Final Action was taken on a total of 730 recommendations (222 audits of which 93 had final actions taken, thus closing the audits). The number of recommendations where a management decision and final action were concurrent was 233 in 103 audits.
[62] Of the 324 audits remaining, 38.27 percent or 124 are under repayment plans.
[63] This figure was adjusted to reflect one retroactive entry.
[64] Audit Reports are duplicated in D.1.(a), D.1.(b) and D.1.(c); thus the total is reduced by 10.
[65] Audit Reports are duplicated in both D.1 and D.2; thus the total is reduced by 30. 4 Litigation, legislation, or investigation is pending for 71 audit reports with costs totaling $275,285,625.
[66] Figures in brackets represent data at the recommendation level as compared to the audit level as described in E.
[67] *Ibid*.

Management Report on Final Action On Audits With Recommendations That Funds Be Put To Better Use		
Audit Reports	**Number of Audit Reports**	**Funds to be put to Better Use**
A. Audit Reports with management decisions on which final action had not been taken at the beginning of the period.[68]	210	$10,366,950,593
B. Audit Reports on which management decisions were made during the period.	22	$2,032,018,355
C. Total audit reports pending final action during period (total of A and B)	232	$12,398,968,948
D. Audit Reports on which final action was taken during the period		
1. Value of Audit Reports implemented (completed)	25	$141,819,534
2. Value of Audit Reports that management concluded should not or could not be implemented	12	$244,752,650
3. Total of 1 and 2[69]	33	$386,572,184
E. Audit Reports needing final action at the end of the period (subtract D3 from C)[70]	199	$12,012,396,764
F. Open recommendations with funds put to better use[71]	[157]	[$10,098,528,536]

[Please note that the Inspector General Act requires reporting at the audit report level versus the individual recommendation level. At the audit report level, total disallowed costs in the report are reported as open until all recommendations in a report are closed.]

[68] This figure has been adjusted to reflect one retroactive entry.
[69] Audit Reports are duplicated in both D.1 and D.2; thus the total is reduced by 4.
[70] Litigation, legislation, or investigation is pending for 28 audit reports with costs totaling $1,609,581,131.
[71] Figures in brackets represent data at the recommendation level as compared to the audit level as described in E.

4

Appendices

Table of Contents

Appendix A - Glossary of Acronyms and Abbreviations

A

ABA	Annual Budget Authority
ACA	Annual Community Assessment
ACA	Asset Control Area
ACC	Annual Contributions Contract
ACOP	Admissions and Continued Ocupancy Policy
ACRS	Administration's system for tracking requests for administrative services
ACS	American Community Survey
ADA	Anti-Deficiency Act (Public Law No. 97–258)
ADM	Administration (HUD Office of)
ACH	Automated Clearing House
AFFH	Affirmatively Furthing Fair Housing
AFGE	American Federation of Government Employees
AFR	Agency Financial Report
AFR	Applicable Federal Rate
AFS	Allowance for Subsidy
AFS	Annual Audited Financial Statement
AHAR	Annual Homeless Assessment Report
AHAP	Agreement to Enter into a Housing Assistance Payment Contract
AHS	American Housing Survey
AI	Analysis of Impediments
AIDS	Acquired Immune Deficiency Syndrome
AIR	Agency Insight Report
ALLL	Allowance for Loan and Lease Losses
AMP	Asset Management Project
APG	Agency Priority Goal
APIC's	America's Private Investment Companies
APP	Annual Performance Plan
APPS	Active Partners Permformance System
APR	Annual Performance Report
ARAMS	Automatic Renewal and Admendment Management Subsystem
ARC	Administrative Resources Center
ARC	Appalachian Reginal Commission
ARCATS	Audit Resolution and Corrective Action Tracking System
ARRA	American Recovery and Reinvestment Act
ARS	Accounts Receivable Subsystem
ASC	Accounting Standards Codification
AWG	Administrative Wage Garnishment
AWITF	Agency-wide Integrity Task Force

B

BA	Budget Authority
BEDI	Brownfields Economic Development Initiative
BETC	Bussiness Event Type Code
BFF	Budget Formulation and Forecasting
BFS	Bureau of the Fiscal Service
BIB	Budget-in-Brief
BLI	Budget Line Item (in LOCCS)
BLS	Bureau of Labor Statistics
BOSS	Budget Outlay Support System
BPD	Bureau of the Public Debt
BRE	Book-Rich Environment Initiative
BRI	Brownfields Redevelopment Initiative
BS	Balance Sheet

C

CAIVRS	Credit Alert Verification Reporting System
CBD	Commerce Business Daily
CBS	Consolidated Balance Sheet
CCB	Change Control Board
CDBG	Community Development Block Grant
CDBG-DR	Community Development Block Grant Disaster Recovery
CDM	Continuous Diagnostics and Mitigation
CEF	Community Empowerment Fund
CFCF	Capital Fund Education and Training Community Facilities
CFFP	Capital Funding Financing Program
CFO	Chief Financial Officer
CFO Act	Chief Financial Officers Act of 1990
CFP	Capital Fund Program
CFR	Code of Federal Regulations
CGE	Concur Government Edition
CHAS	Comprhensive Housing Affordability Strategy
CHDO	Community Housing Development Organization
CHRB	Community Housing Resource Board
CIO	Chief Information Officer
CIR	Congressional and Intergovernmental Relations
CIRT	Computer Incident Response Team
CITI	Correcting Incorrect Tenant Identifiers
CISO	Chief Information Security Officer
CLPHA	Council of Large Public Hosing Authorities
CM	Continuous Monitoring
CMA	Computer Matching Agreement
CMHI	Cooperative Management Housing Insurance
CMIA	Cash Management Improvement Act of 1990
CNA	Capital Needs Assessment
CNA	Comprehensive Needs Assessment
CO	Contracting Officer
CoC	Continuum of Care
COCC	Central Office Cost Centers
COE	Army Corps of Engineers
COOP	Continuity of Operations
COS	Contract Oversight Specialist
COR	Contracting Officer's Representative
COTS	Commercial off the Shelf
COTR	Contracting Officer Technical Representative
CPD	Office of Community Planning and Development
CPO	Chief Procurment Officer
CPU	Cost Per Unit
CRO	Chief Risk Officer
CSAM	Cyber Security Assessment & Management
CSI	Community Stratigies Institute
CSRS	Civil Service Retirement System
CWCOT	Claims Without Conveyance of Title
CY	Calendar Year

D

DAP Development Application Processing
DARTS Departmental Accounts Receivable Tracking/Collecting System
DASP Distressed Asset Stabilization Program
DATA Act Digital Accountability and Transparency Act of 2014
DBI Debenture Interest
DCAMS Debt Collection Asset Management System
DCIA Debt Collection Improvement Act
DCR Debt Coverage Ratio
DE Direct Endosement
DEC Departmental Enfourcement Center
DGMS Departmental Grants Management System
DHAP Disaster Housing Assistance Program
DHS U.S Department of Homeland Security
DHHL Department of Hawaiian Home Lands
DOD U.S. Department of Defense
DOE U.S. Department of Energy
DOJ U.S. Department of Justice
DOL U.S. Department of Labor
DLP Data Loss Prevention
DMF Death Master File
DNP Do Not Pay
DRAA Disaster Relief Appropriations Act
DRGR Disaster Recovery Grant Reporting
DRIG Disaster Recovery Information Guide
DRSI Disaster Recovery Special Issues
DSRS Distributive Shares and Refund System
DUNS Dun and Bradstreet Numbering System

E

ED U.S. Department of Education
EEM Energy Efficient Mortgage
EHLP Emergency Homeowner's Loan Program
EIV Enterprise Income Verification System
ELOCCS Electronic Line of Credit Control System
eLOCCS Electronic Line of Credit Control System
eSNAPS Electronic Special Needs Assistance Programs
EPA Environmental Protection Agency
ENW Economic Net Worth
EPIC Energy and Performance Information Center
EPLS Excluded Parties List System
EPPES Employee Performance Planning Evaluation Systems
ERM Enterprise Risk Management
EFRM Enterprise and Fraud Risk Management
ERO Ginnie Mae's Office of Enterprise Risk
ERP Enterprise Resource Planning Principles
ESA Essential Supporting Activities
ESG Emergency Solutions Grants

F

FACD Financial Analysis and Control Division
FAF Financing Adjustment Factor
FAFSA Free Application for Federal Student Aid
FAWG Formalized Fraud Analytics Working Group
FAMES Federal Asset Management Enterprise System
FAPIIS Federal Awardee Performance and Integrity Information System
FAR Federal Acquisitions Regulations
FASAB Federal Accounting Standards Advisory Board
FASS Financial Assessment Subsystem
FBWT Fund Balance with Treasury
FCAD Funds Control Assurance Division
FCRA Federal Credit Reform Act of 1990 FECA Federal Employee Compensation Act of 1916
FERS Federal Employees Retirement System
FERA Front End Risk Assessment
FFATA Federal Funding Accountability and Transparency Act of 2006
FFB Federal Financing Bank
FFMIA Federal Financial Management Improvement Act
FHA Federal Housing Administration
FHA-HAMP FHA's Home Affordable Modification Program
FHAP Fair Housing Assistance Program
FHASL Federal Housing Administration Subsidiary Ledger
FHEO Office of Fair Housing and Equal Opportunity
FHIP Fair Housing Initiatives Program
FIFO First-in, First-out
FIRMS Facilities Integrated Resources Management System
FISMA Federal Information Security Management Act
FLRA Federal Labor Relations Authority
FM Financial Management
FMCS Federal Mediation and Conciliation Service
FMFIA Federal Managers' Financial Integrity Act (Public Law No. 97-255)
FMC Financial Management Center
FN Financial Notes
FOC Financial Operation Center
FOIA Freedom of Information Act
FPM Field Policy and Man
FPPD Financial Policies & Proceedures Division
FR Federal Register
FRD Finanical Reporting Division
FRDAA Fraud Reduction and Data Analystics Act of 2015
FRM Fraud Risk Management
FS Financial Statements
FSA Federal Student Aid
FSSP Federal Shared Service Provider
FTE Full-Time Equivalent
FWAC Fort Worth Accounting Center
FY Fiscal Year
FYE Fiscal Year End

G

GAAP Generally Accepted Accounting Principles
GAO Government Accountability Office
GEAR Goals-Engagement-Accountability-Results
GFAS Ginnie Mae Financial Accounting System
GI General Insurance
Ginnie-Mae Government National Mortgage Association
GLR Campaign for Grade Level Reading
GL General Ledger
GNMA Government National Mortgage Association
GSA General Services Administration
GTAS Government Treasury Account Symbol Adjusted Trial Balance System

H

H4H HOPE for Homeowners
HAMP Home Affordable Modification Program
HAP Housing Assistance Payment

HCAAF	Human Capital Assessment and Accountability Framework
HCFSS	HUD Consolidated Financial Statement System
HCV	Housing Choice Voucher
HEARTH-Act	Homeless Emergency Assistance and Rapid Transition to Housing Act
HEAT	HUD Enterprise and Architectural Transformation
HECM	Home Equity Conversion Mortgage
HEROS	HUD's Environmental Review Online System
HFS	Held For Sale
HFA	Housing Finance Authorities
HFI	Held for Investment
HHGMS	Healthy Homes Grants Management System
HIAMS	HUD Integrated Acquisition Management System
HIFMIP	HUD Integrated Financial Management Improvement Project
HIV	Human Immunodeficiency Virus
HMIS	Homeless Management Information Systems
HOME	HOME Investment Partnerships Program
HOPE VI	Program for Revitalization of Severely Distressed Public Housing
HOPWA	Housing Opportunities for Persons with AIDS
HPS	HUD Procurement System
HQ	Headquarters
HQS	Housing Quality Standard
HR	Human Resources
HUD	U.S. Department of Housing and Urban Development
HUD-CAPS	HUD's Central Accounting and Program System
HUD-VASH	HUD-VA Supportive Housing
HSNG-FHA	Office of Housing-Federal Housing Administration

I

IAA	Inter-Agency Agreement
IAS	Inventory of Automated Systems
Ibid	In the same place (latin word, commonly used in endnote, footnote, bibliography citation, or scholarly reference to refer to the source cited in the preceding note or list item.)
ICDBG	Indian Community Development Block Grant
ICOFR	Internal Controls Over Financial Reporting
IDIS	Integrated Disbursement and Information System
IG	Inspector General
IHA	Indian Housing Authority
IHBG	Indian Housing Block Grant
IP	Improper Payment
IPA	Initial Privacy Assessment
IPA	Intergovernmental Personnel Act of 1970 (Public Law 91-648)
IPAC	Intra-Government Payment and Collection
IPERA	Improper Payments Elimination and Recovery Act
IPERIA	Improper Payments Elimination and Recovery Improvement Act
IPIA	Improper Payments Information Act of 2002
IPMS	Integrated Pool Management System
IPP	Invoice Processing Platform
IPT	Integrated Project Team
iREMS	Integrated Real Estate Management System
IRS	Internal Revenue Service
ISCM	Information Security Continuous Monitoring
iSERS	integrated Subsidy Reporting System
ISIM	IBM Security Identity Manager
IT	Information Technology
IUS	Internal Use Software
IVT	Income Verification Tool

J

JFMIP	Joint Financial Management Improvement Program

L

LAS	Loan Accounting System
LEED	Leadership in Energy and Environmental Design
LGBTQ	Lesbian/Gay/Bisexual/Transgender /Queer
LIHTC	Low-Income Housing Tax Credit
LLG	Liability for Loan Guarantees
LLR	Loan Review System
LOCCS	Line of Credit Control Systems
LRL	Legal Representative Letter
LRS	Loan Review System
LSAs	Loan Security Administrators
LSHR	Lead Safe Housing Rule

M

MBS	Mortgage Backed Securities
MCA	Maximum Claim Amount.
MCR	Management Control Reviews
MFH	Multifamily Housing
MFIC	Multi-Family Insurance Claims
MI	Mortgage Insurance
move-LINQ	moveLINQ Relocation Management Software
MMI	Mutual Mortgage Insurance
MMS	Manager Self-Service
MNA	Mortgage Note Assigned
Mod-Rehab	Moderate Rehabilitation
MRL	Management Representative Letter
MOU	Memorandum of Understanding
MSS	Master Sub-servicer
MTW	Moving-to-Work

N

NAHA	National Affordable Housing Act of 1990
NAPA	National Academy of Public Administration
NC	Non-Compliance
NCATS	National Cybersecurity Assessment and Technical Services
NCIS	New Core Interface Solution
NCWIT	National Center for Women and Technology
NDNH	National Directory of New Hires
NDRC	National Disaster Resilience Competition
New-Core	New Core project
NFC	National Finance Center
NFHTA	National Fair Housing Training Academy
NGMS	Next Generation Management System
NHHBG	Native Hawaiian Housing Block Grant
NIST	National Institute of Standards
NOFA	Notice of Funding Availability
NRA	Net Restricted Assets

NSP	Neighborhood Stabilization Program
NSP1	Neighborhood Stabilization Program 1
NSP2	Neighborhood Stabilization Program 2
NSP3	Neighborhood Stabilization Program 3
NSPIRE	National Standards for the Physical Inspection of Real Estate
NSP TA	Neighborhood Stabilization Program Technical Assistance

O

OA	Office of Administration
OA	Occupancy Agreements
O/A	Owner of Management Agents
OASDI	Old-Age, Survivors, and Disability Insurance
OBI	Oracle Business Intelligence
OBT	Office of Business Transformation
OBIEE	Oracle Business Intelligence Enterprise Edition
OCAO	Office of the Chief Administrative Officer
OCFO	Office of the Chief Financial Officer
OCHCO	Office of the Chief Human Capital Officer
OCIO	Office of the Chief Information Officer
OCPO	Office of the Chief Procurement Officer
OE	Office of Evaluation
OER	Ginnie Mae's Office of Enterprise Risk
OGC	Office of General Council
OHVP	Office of Housing Voucher Program
OI	Other Information
OIG	Office of Inspector General
OITS	Office of IT Security
OLG	Office of Loan Guarantee
OLHCHH	Office of Lead Hazard Control and Healthy Homes
OMB	Office of Management and Budget
ONAP	Office of Native American Programs
OneCPD	OneCPD Integrated Practitioner Assistance System
OPEB	Other Post-Employment Benefits
OPHVP	Office of Public Housing Voucher Program
OPM	Office of Personnel Management
ORB	Other Retirement Benefits
OSPM	Office of Strategic Planning and Management

P

PAE	Participating Administrative Entity
PACE	Property Assessed Clean Energy
PAS	Program Accounting Systems
PBC	Performance Based Contract
PBRA	Project-Based Rental Assistance
PBRD	Payroll, Benefits, and Retirement Division
PBV	Project-Based Vouchers
PCI	Purchased Credit Impaired (PCI)
PDF	Portable Document Format
PD&R	Office of Policy Development and Research
PFS	Pay for Success
PH	Public Housing
PH Capital-Fund	Public Housing Capital Fund
PHA	Public Housing Authority
P&I	Principal and Interest
PIC	PIH Information Center
PIH	Office of Public and Indian Housing
PIO	Performance Improvement Officer
PIT	Point-in-Time
PIV	Personal Identity Verification
P.L.	Public Law
PLSA	Primary Local Security Administrator
PMM	Purchase Money Mortgages
PNA	Physical Needs Assessment
POA&M	Plan of Action & Milestones
POC	Point of Contact
POL	Position Organization Listing
POST	Public and Indian Housing One-Stop Tool
PPA	Prompt Payment Act (Public Law No. 97-177)
PP&E	Property, Plant, and Equipment
PPM	Project Portfolio Management
PRA	Paperwork Reduction Act
PRISM	Federal acquisition system used by ARC
PSCT	Personnel Service Coting Tool
PY	Previous Year

Q

Q1	Quarter 1
Q2	Quarter 2
Q3	Quarter 3
Q4	Quarter 4
QAD	Quality Assurance Division
QC	Quality Control
QMR	Quarterly Management Reviews

R

RA	Risk Assessment
RAD	Rental Assistance Demonstration
RAP	Rental Assistance Payment
RBD	Rebuild by Design
RD	Rural Development
Recovery-Act	American Recovery and Reinvestment Act of 2009
RPA	Robotics Process
REAC	Real Estate Assessment Center
REMIC	Real Estate Mortgage Investment Conduits
Rent-Supp	Rental Supplement
REV-6	Funds Control Handbook
RHAP	Rental Housing Assistance Programs
RHEI	Road Home Elevation Incentive
RHYMIS	Runaway and Homeless Youth Management Information Systems
RIF	Rural Innovation Fund
RLF	Revolving Loan Fund
RMD	Risk Management Division
RMC	Risk Management Council
RMF	Risk Management Framework
RNP	Restricted Net Position
ROA	Return on Assets
RSSI	Required Supplementary Stewardship Information

S

SAM	System for Award Management
SAMS	Single Family Acquired Asset Management System
SAFMR	Small Area Fair Market Rent
SBR	Statement of Budgetary Resources
SCNP	Statement of Changes in Net Position
SD	Significant Deficiency
SDLC	System Development Life Cycle
S&E	Salary and Expense
SEMAP	Section 8 Management Assessment Program
SES	Senior Executive Service
SER	Single Effective Rate

SF Single Family
SFCB Single Family Claims Branch
SFDW Single Family Data Warehouse
SFFAS Statements of Federal Financial Accounting Standards
SFIC Single-Family Insurance System
SFIS Single-Family Insurance System
SFTP Secure File Transfer Protocol
SHOP Self Help Homeowner Opportunity Program
SHP Supportive Housing Program
SMART Single Family Mortgage Notes Recovery Technology
SNAPS Special Needs Assistance Programs
SNC Statement of Net Cost
SOA State Statement of Assurance
SOAR Students + Opportunities + Achievements = Results
SOP Standard Operating Procedure
SP Special Publication
SPS Small Purchase System
SRI Special Risk Insurance
SSA Social Security Administration
SSCRA Soldiers and Sailors Civil Relief Act
SSP Shared Service Provider
SSN Social Security Number
SSVF Supportive Services for Veteran Families
STEM Science, Technology, Engineering, and Math

T

TA Technical Assistance
TAFS Treasury Account Fund Symbols
TBRA Tenant-Based Rental Assistance
TDHE Tribally Designated Housing Entity
TDR Troubled Debt Restructurings
TE Tax Exempt
TEAM Total Estimated and Allocation Mechanism
TI Transformation Initiatives
TMF Technology Modernization Fund
TOP Treasury Offset Program
TPV Tenant Protection Voucher
TR Technical Release
TRACS Tenant Rental Assistance Certification System
Treasury U.S. Department of the Treasury

U-Z

UPB Unpaid Principal Balance
UPCS-V Uniform Physical Condition Standards for Voucher Programs
U.S. United States of America
U.S.C. United States Code
USDA U.S. Department of Agriculture
USICH United States Interagency Council on Homelessness
USSGL U.S. Standard General Ledger
VA U.S. Department of Veterans Affairs
VAMC VA Medical Center
VCA Voluntary Compliance Agreement
VMS Voucher Management System
VAWA Violance Against Women Act
WebTA HUD's Time and Attendance System
WASS Web Access Secure System
WCF Working Capital Fund
WHORC White House Opportunity and Revitalization Council

Appendix B - Table of Websites

HUD's Resources for Homeowners, Renters, Citizens, and Partners

Sign up for HUD Email Lists

HUD Toll-Free Hotlines

HUD's Local Offices

HUD's Site Index/Quick Links

Home Affordable Modification Program

Housing Choice Voucher

Native American Programs

Rental Assistance Demonstration

Lead Disclosure Rule for pre-1978 homes

Help for Homeowners, Renters, and Citizens

Owning a Home

Affordable Apartment Search

Buy Versus Rent Calculator

Fair Market Rent

FHA Mortgage Limits

Foreclosure Avoidance Counseling

Homeownership Mortgage Calculator

HUD Approved Condominium Projects

HUD Approved Housing Counseling Agencies

HUD Homes for Sale

Lender Locator

Home Affordability Estimator Calculator

Loan Affordability Estimator Calculator

Links to Other Resources and HUD Research

HUD's Budget and Performance Reports

HUD's FY 2018-2022 Strategic Plan

HUD's FY 2015 Annual Performance Report & FY 2017 Annual Performance Plan

HUD Webcasts

Online Library

Performance.gov

HUDUser.gov

HUD Program Offices and Field Offices

Center for Faith-Based and Neighborhood Partnerships

Chief Financial Officer

Chief Information Officer

Community Planning and Development

Fair Housing and Equal Opportunity

Federal Housing Administration (FHA)

General Counsel

Ginnie Mae

Healthcare Programs

Lead Hazard Control and Healthy Homes

HOME Investment Partnerships Program

Housing

Housing Counseling Program

Multifamily Housing

Policy Development and Research

Programs of HUD

Public and Indian Housing

Single Family Housing

Strategic Planning and Management

Access for Housing Authorities and other HUD Partners

eCon Planning Suite

FHA Connection

Information for Housing Counselors

Public and Indian Housing One-Stop Tool (POST) for PHAs

Help for Mortgagees

Appraiser Selection by Lender

Approved Appraisers

Holding the Mortgage Industry Accountable

Housing Scorecard

Mortgagee Letters

Neighborhood Watch

Appendix C - Social Media/Other Links

Follow HUD at:

Featured Initiatives

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We want to hear from you. If you have any questions or comments, please contact the Office of the Chief Financial Officer at 202-708-1946.

For any comments or feedback about this document, mail them to:

U.S. Department of Housing
and Urban Development
451 7th St. SW, Room 3126
Washington, DC 20410
Attention: Chief Financial Officer

Or email them to:

AgencyFinancialReport@HUD.gov

To view the report on the internet, visit:

https://www.hud.gov/sites/dfiles/CFO/documents/afr2019.pdf

WWW.HUD.GOV