



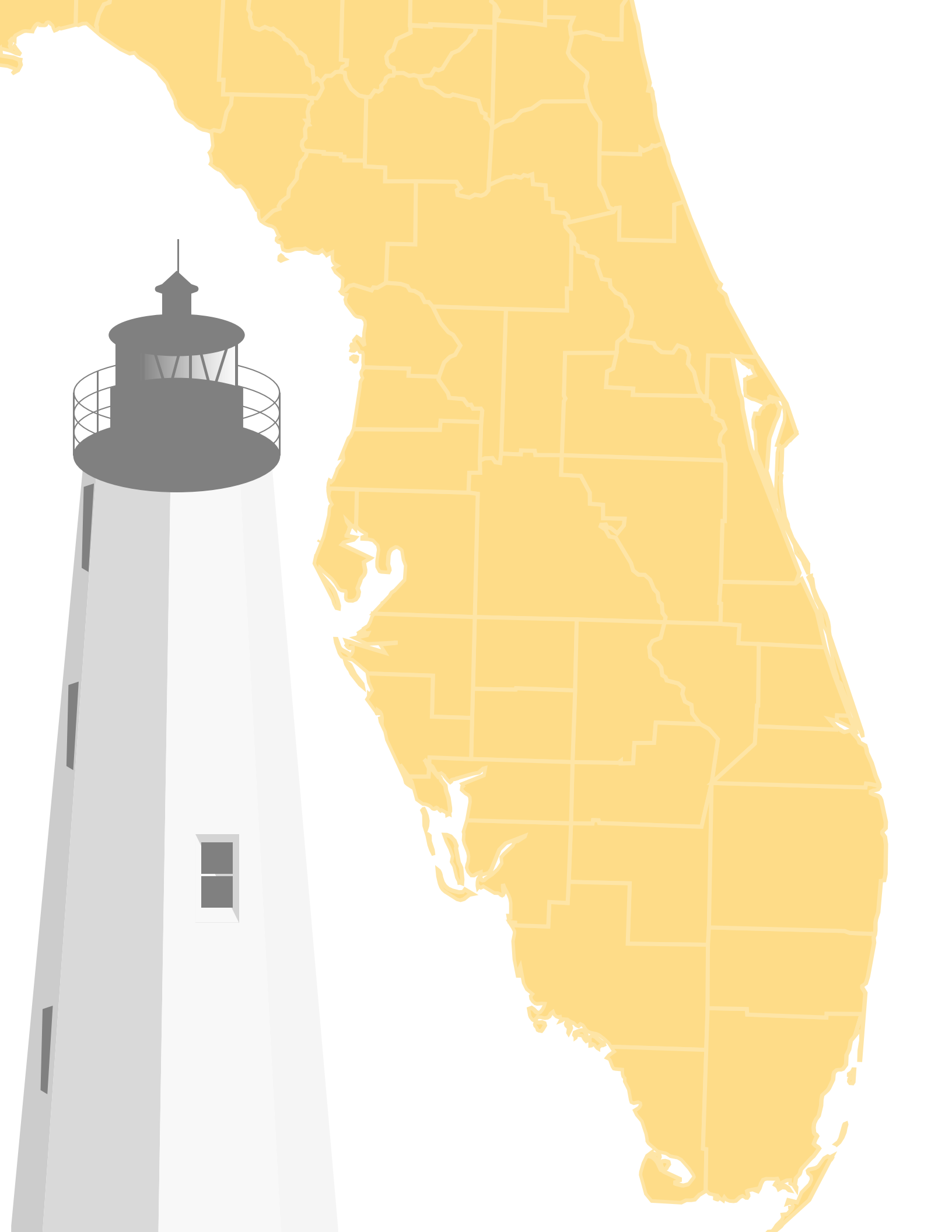
ENHANCING PUBLIC TRUST IN FLORIDA'S AFFORDABLE HOUSING

**FLORIDA HOUSING FINANCE CORPORATION**

# OFFICE OF THE INSPECTOR GENERAL

ANNUAL REPORT - FISCAL YEAR 2018

**CHRIS HIRST | INSPECTOR GENERAL**





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# INTRODUCTION

Section 20.055, Florida Statutes, requires each Inspector General to submit an annual report summarizing its activities during the preceding fiscal year (FY). This report includes, but is not limited to:

- A summary of each audit and investigation completed during the reporting period;
- A description of significant abuses and deficiencies relating to the administration of programs and operations of the agency disclosed by investigations, audits, reviews, or other activities during the reporting period; and
- A description of recommendations for corrective action made by the Office of Inspector General (OIG) during the reporting period with respect to significant problems, abuses, or deficiencies identified.

This annual report summarizes the OIG's activities and accomplishments for FY 2018 (January 1 – December 31).

# BACKGROUND

Florida Housing Finance Corporation (Florida Housing) was created by the state Legislature 35 years ago to assist in providing a range of affordable housing opportunities for residents that help make Florida communities great places in which to live, work and do business. Florida Housing is a public corporation of the State of Florida and is considered a financial institution. Additionally, Florida Housing is not a department of the executive branch of state government but is an instrumentality of the State.

Florida Housing's vision is to be recognized as an outstanding provider of innovative, measurable, data-driven and fiscally sustainable solutions that respond to the affordable housing challenges of the state.

Today, Florida Housing continues its mission by increasing affordable housing opportunities and ensuring that its programs are well matched to the needs of those served. Florida Housing knows that they cannot accomplish the mission alone. As such, Florida Housing continues to work with federal, state and local governments, non-profits, elected officials and others to help spread the importance of affordable housing in Florida's communities.





## FLORIDA HOUSING'S PROGRAMS

### **MULTIFAMILY PROGRAMS**

Multifamily development programs (or rental housing program) include State Apartment Incentive Loan (SAIL), Multifamily Mortgage Revenue Bonds (MMRB), HOME Investment Partnerships, Elderly Housing Community Loan (EHCL), Low Income Housing Tax Credit (LIHTC) program, Grants to Serve Persons with Developmental Disabilities and National Housing Trust Fund.

#### **State Apartment Incentive Loan (SAIL)**

Provides developers with the gap financing needed to obtain full financing of affordable rental housing.

#### **Elderly Housing Community Loan (EHCL)**

Offers up to \$750,000 in loans to make substantial improvements to existing affordable rental housing for the elderly.

#### **HOME Investment Partnerships**

Makes low or no interest, non-amortizing loans to developers who acquire, rehabilitate or construct housing for low income families.

#### **Low Income Housing Tax Credits (LIHTC)**

Provides nonprofit and for-profit developers with a dollar-for-dollar reduction in federal tax liability in exchange for the development of affordable rental housing.

#### **Multifamily Mortgage Revenue Bonds (MMRB)**

Uses both taxable and tax-exempt bonds to provide below market rate construction loans to nonprofit and for-profit developers of affordable housing.

#### **Predevelopment Loan Program**

Assists affordable housing developers with up to \$750,000 in financing for predevelopment activities associated with the construction of affordable housing, such as rezoning, title searches, impact fees and other requirements.

#### **Grants for Housing to Serve Persons with Developmental Disabilities**

Grants are available to private nonprofit organizations with a primary mission includes serving persons with developmental disabilities. Developments eligible for these grants include community residential homes (CRHs) as defined in Section 419.001, Florida Statutes, and licensed by the Florida Agency for Persons with Disabilities; individual supported living units; and apartment properties that provide permanent supportive housing units. Funds may be used to renovate existing CRHs or build new properties.

# FLORIDA HOUSING'S PROGRAMS



Florida Housing's evaluation process for competitive development applications includes the extent of funds from local and other sources used to leverage these grant funds; employment opportunities and supports that will be available to residents of the housing; a plan for residents to effectively access community-based services, resources, and amenities; and partnerships with other supportive services agencies.

Developments receiving these grant funds must commit to serve persons with developmental disabilities with incomes at or below 60% of the median income in the area where the property is to be built.

## **National Housing Trust Fund (NHTF)**

A federal program that provides funding for affordable housing for Extremely Low Income (ELI) households with incomes at or below 30% of Area Median Income. Each state must develop an allocation plan to guide how the funds will be used and update the plan each year. This plan is part of the Annual Action Plan associated with the State of Florida's adopted 5-year Consolidated Plan.

The Plan is part of the 5-year State of Florida Consolidated Plan and affiliated Annual Action Plan that describes the priorities, uses and distribution of four other programs administered at the state level: the Community Development Block Grant program, administered by the Florida Department of Economic Opportunity; the Emergency Solutions Grant, administered by the Florida Department of Children and Families; the Housing Opportunities for Persons with AIDS program, administered by the Florida Department of Health; and the HOME program, also administered by Florida Housing.

# FLORIDA HOUSING'S PROGRAMS

## **HOMEBUYERS**

Florida Housing offers homeownership programs through our Homebuyer Programs and our Mortgage Credit Certificate (MCC) Program.

### **Homebuyer Programs**

Offers 30-year fixed rate first mortgage loans to first time homebuyers through participating lenders and lending institutions throughout the State of Florida. Eligible borrowers may also participate in one of Florida Housing's second mortgage programs to assist borrowers with down payment assistance and closing costs.

### **Mortgage Credit Certificate Program (MCC)**

Offers eligible first-time homebuyers a nonrefundable Federal income tax credit which can be utilized with a lender's first mortgage. The MCC reduces an eligible borrower's Federal income taxes and, in effect, creating additional income for the borrower to use in making mortgage payments or other household expenses. Florida Housing's Program offers a tax credit amount of up to 50%, based on loan amount.

### **Down payment Assistance Program**

Offers down payment and closing cost assistance in the form of a second mortgage loan to assist eligible homebuyers with their down payment and closing costs. Down payment assistance is only available when used in conjunction with Florida Housing's first mortgage loan. Down payment assistance is NOT available as "stand alone" down payment assistance.





# FLORIDA HOUSING'S PROGRAMS

## **HOMEOWNERS**

Florida Housing also offers assistance to homeowners such as: Florida Hardest-Hit Fund, Foreclosure Counseling Program and SHIP Disaster Relief Programs.

Florida Hardest Hit Fund (HHF) Program details are listed below:

- **Hardest-Hit Fund Down Payment Assistance (HHF-DPA) Program**  
Provides qualified first-time homebuyers with up to \$15,000 in down payment and closing costs assistance in specified counties.
- **Elderly Mortgage Assistance Program (ELMORE)**  
The Florida HHF Elderly Mortgage Assistance Program (ELMORE) is designed to assist seniors who are in arrears on their reverse mortgage (also known as a HECM—home equity conversion mortgage) by providing up to \$50,000 to pay past due and future property charges, so that they may avoid foreclosure and can stay in their homes.
- **Unemployment Mortgage Assistance Program (UMAP) - Closed**  
Provided up to 12 months of payments (with a cap of \$24,000, whichever comes first) paid directly to the mortgage lender to assist unemployed or underemployed borrowers with their first mortgage. In addition, up to \$18,000 could be paid to help satisfy all or some of any past due amounts owed to the mortgage lender; this assistance would have been paid prior to the UMAP payments beginning and cannot exceed \$18,000 total. Total assistance available was up to \$42,000.
- **Mortgage Loan Reinstatement Payment (MLRP) Program - Closed**  
Used as a one-time payment to the mortgage lender to help satisfy all or some of any past due amounts owed on the first mortgage, only. This assistance could not exceed \$25,000 total, and any past due amounts over and above the \$25,000 could not be paid by the MLRP program and were the responsibility of the homeowner.
- **Principal Reduction (PR) Program - Closed**  
Was designed to assist eligible homeowners by providing up to \$50,000 to reduce the principal balance of the first mortgage, only, thereby reducing the loan-to-value (LTV) of their outstanding principal loan balance to no less than 100 percent.

## **Foreclosure Counseling Program (FCP)**

Helps prevent homeowners from going into foreclosure; and Provides at-risk homeowners with good financial management education to help them better manage their money and assist them with credit problems to become financially stable. Florida Housing delivers these services through HUD approved housing counseling agencies (HCAs) that will carry out foreclosure counseling services and more extensive financial management education.

## **Disaster Relief Resources and Information**

Works with state and federal officials to provide information on disaster relief resources and information and provides available resources to assist individuals with recovery efforts.





## **RENTERS**

### **Find an Affordable Apartment**

Floridahousingsearch.org is a free, online affordable housing locator service that makes it easier to find affordable rental housing around the State. This locator is part of Florida Housing's ongoing effort to respond to housing needs in general and specifically during natural disasters. Floridahousingsearch.org provides real time information on property vacancies, features and amenities, rents and deposits and detailed information on the number of bedrooms and bathrooms. The locator also allows users to map the location of the property.

## **PRESERVATION INITIATIVES**

### **Florida Preservation Fund**

In 2008 Florida Housing, with direction from the Florida State Legislature, established a pilot demonstration program to help preserve affordable rental housing in Orange, Palm Beach, and Pasco counties. The Florida Community Loan Fund (FCLF) was competitively selected as administrator of the pilot. FCLF is a nonprofit, statewide Community Development Financial Institution established in 1994. FCLF's "Florida Preservation Fund" uses private and public funding sources to:

- Preserve affordable multifamily rental housing in Florida;
- Provide loans to developers for acquisition and/or rehabilitation of affordable multifamily rental properties; and
- Help ensure the availability of homes for families receiving project-based rental assistance.

## **SPECIAL PROGRAMS**

### **State Housing Initiatives Partnership (SHIP)**

Florida Housing administers the State Housing Initiatives Partnership program (SHIP), which provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing. The program was designed to serve very low, low- and moderate-income families.

### **Catalyst Program**

The Catalyst Program provides community-based organizations and state and local governments with technical assistance to meet affordable housing needs.

### **Predevelopment Loan Program (PLP)**

The Predevelopment Loan Program (PLP) helps nonprofit and community-based organizations, local governments, and public housing authorities plan, finance, and develop affordable housing.

### **Preservation Rehabilitation Pilot Program**

From the funds in Specific Appropriation 1616, \$10,000,000 in non-recurring funds in the State Housing Trust Fund is provided for a preservation rehabilitation pilot program in Pasco, Palm Beach and Orange counties targeting rental housing that receives or has received funding from any federal or state housing funding program.

# OFFICE OF INSPECTOR GENERAL

In 2000, Florida Housing re-established the internal audit function and in 2011, Sections 20.055 and 420.506, Florida Statutes, were amended to create the OIG within Florida Housing.

The OIG is an essential component of Florida Housing providing independent, objective assurance and consulting services designed to add value and improve operations.

The OIG serves as a central point of coordination and is responsible for activities that provide accountability, integrity, and efficiency. This is accomplished by the OIG conducting independent audits, investigations, and other accountability activities. The OIG's purpose is to promote economy and efficiency and to prevent and detect fraud, waste, and abuse in programs and operations carried out or financed by Florida Housing.

The OIG ensures effective coordination and cooperation between the Florida Auditor General, the Office of Program Policy Analysis and Government Accountability (OPPAGA), federal auditors, and other governmental bodies to ensure efficiency and avoid duplication of services.

Pursuant to statute, the OIG has full, free, and unrestricted access to all Florida Housing activities, records, data, and property, and may request any other information deemed necessary to carry out audit assignments or investigative needs. The unrestricted access ensures audits, investigations, and other activities are independent.

## STATUTORY REQUIREMENTS

As outlined in Section 20.055, Florida Statutes, the specific duties and responsibilities of the Inspector General include:

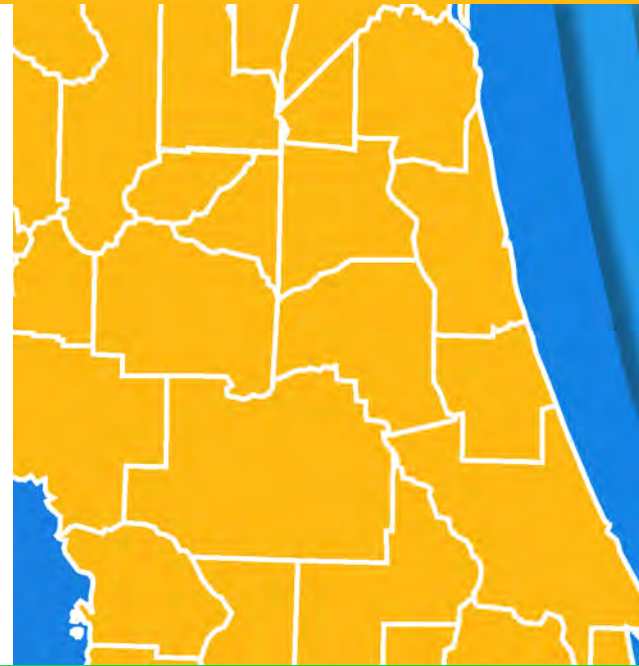
- Providing direction for, supervising, and coordinating audits, investigations, and management reviews relating to the programs and operations of the agency;
- Keeping the agency head [the Board of Directors of Florida Housing] informed of fraud, abuses, and deficiencies relating to programs and operations administered or financed by the agency, recommending corrective actions concerning fraud, abuses, and deficiencies, and reporting on the progress made in implementing corrective action;
- Reviewing the actions taken by the agency to improve program performance and making recommendations for improvement;
- Conducting, supervising, and coordinating activities that promote economy and efficiency and prevent or detect fraud, waste, and abuse;
- Ensuring effective coordination and cooperation between the Auditor General, federal auditors, and other governmental bodies;
- Reviewing rules relating to programs and operations and making recommendations regarding impact;
- Assessing the reliability and validity of information provided on performance measures and standards and making recommendations as needed; and
- Ensuring an appropriate balance between audit, investigative, and other accountability activities.

# PROFESSIONAL STANDARDS

Pursuant to Section 20.055, Florida Statute, the OIG is required to:

- Comply with the General Principles and Standards for Offices of Inspector General as published and revised by the Association of Inspectors General.
- Conduct audits in accordance with the current International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors, Inc., or, where appropriate, in accordance with Generally Accepted Governmental Auditing Standards.

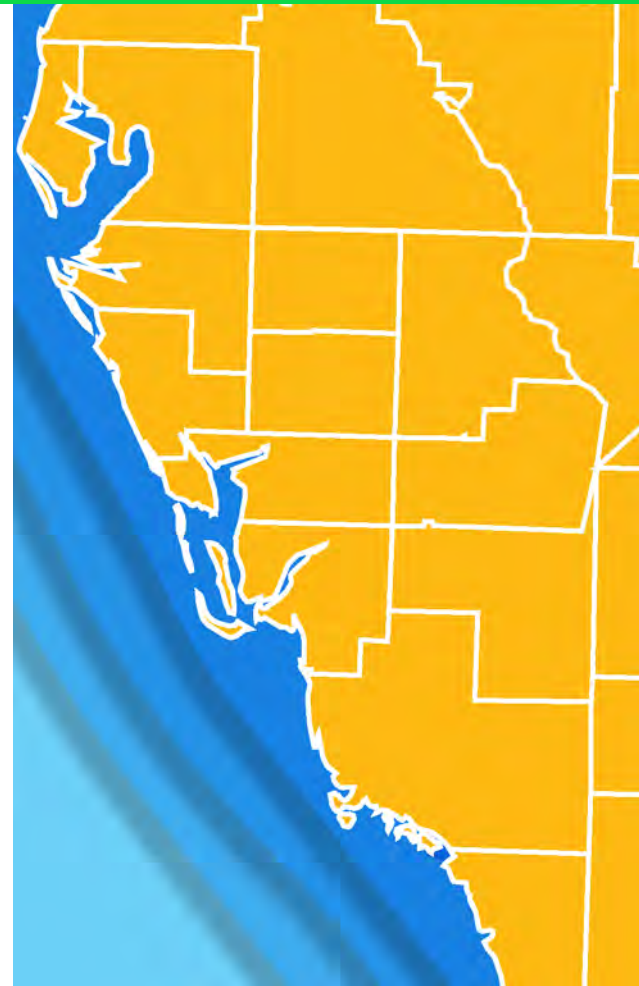
Since receiving accreditation, the OIG is also following the Commission for Florida Law Enforcement Accreditation's, The Florida Inspectors General Standards Manual for the investigative section



# PROFESSIONAL CERTIFICATIONS

Current staff members hold the following certifications:

- Certified Authorization Professional (1)
- Certified Fraud Examiner (3)
- Certified Government Audit Professional (1)
- Certified Government Financial Manager (1)
- Certified Information Systems Auditor (1)
- Certified Information Systems Security Professional - Information Systems Security Management Professional (1)
- Certified Inspector General (2)
- Certified Inspector General Auditor (3)
- Certified Inspector General Investigator (2)
- Certified Internal Auditor (2)
- Certified Public Manager (2)
- Notary Public (4)



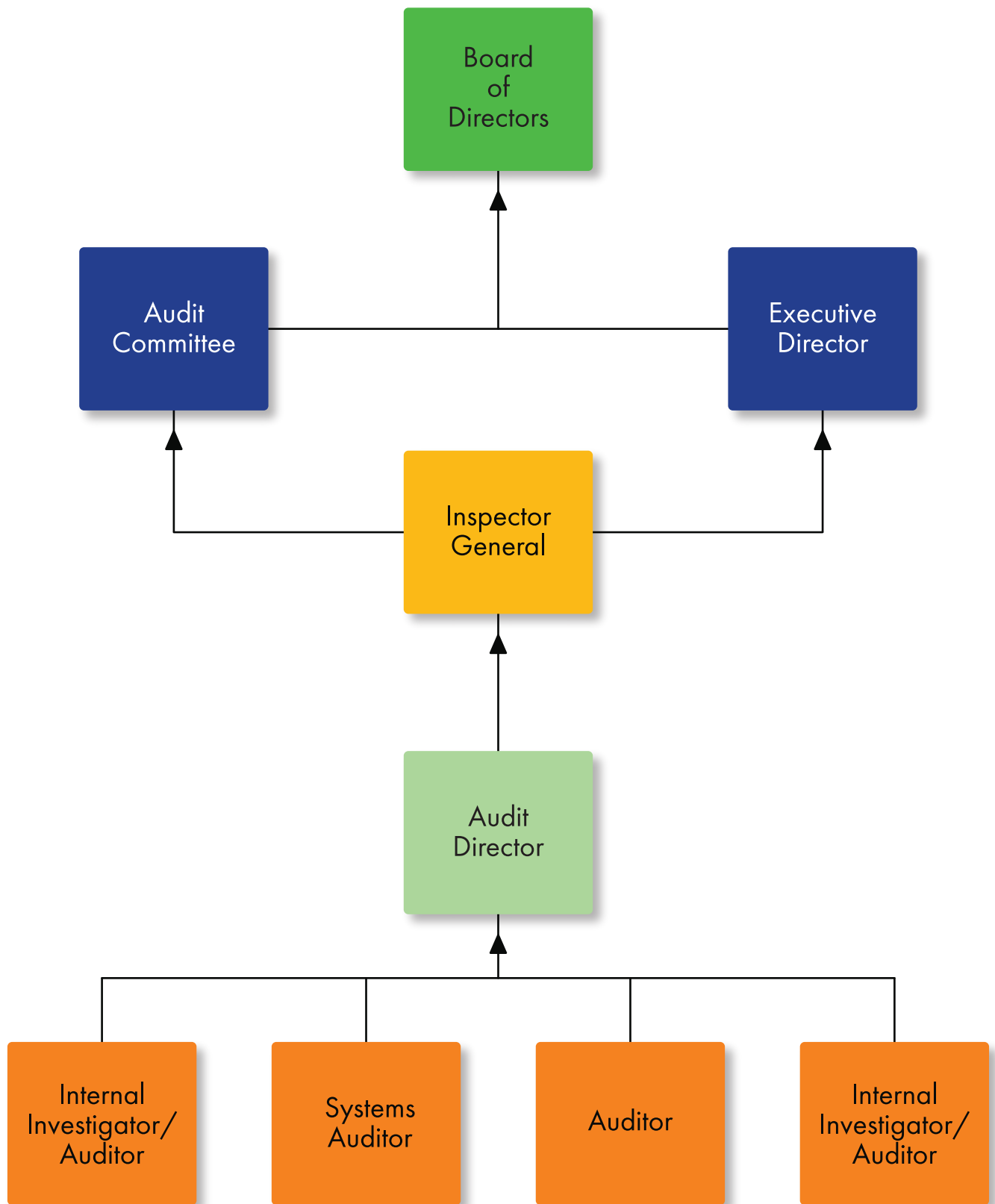
# PROFESSIONAL ORGANIZATIONS

Current staff members belong to the following organizations:

- Association of Certified Fraud Examiners (ACFE)
- Association of Government Accountants (AGA)
- Association of Inspectors General (AIG)
- Federal Bureau of Investigation National Academy (FBINA)
- Institute of Internal Auditors (IIA)
- Information Systems Audit and Control Association (ISACA)
- International Information Systems Security Certification Consortium ((ISC)<sup>2</sup>)



# ORGANIZATIONAL CHART



# INVESTIGATIONS SECTION



## INVESTIGATIVE SECTION

The Investigative Section’s primary responsibility is initiating, conducting and coordinating investigations that are designed to detect, deter, prevent and eradicate fraud, waste, abuse, mismanagement, misconduct and other abuses within Florida Housing and the contracted entities of Florida Housing.

The OIG typically receives complaints or requests for assistance from the Office of the Chief Inspector General, Florida Housing or Contracted Agency employees, and the general public via website complaint form submission, telephone, letter, fax, or email. The OIG received a total of 116 complaints or requests for assistance during 2018. Complaints received by the OIG are reviewed and either resolved, referred, or investigated.

<b>Of the total number of requests for assistance (96) and complaints (20) received in 2018:</b>	
3	requests for assistance were received from Florida Housing management;
7	requests for assistance were non-jurisdictional and were referred to the appropriate entity;
86	requests for assistance were referred to Florida Housing management for resolution as deemed appropriate;
16	complaints were opened for management review, investigative review or investigation; and
4	complaints are pending receipt of additional information to determine whether a management review, investigative review or investigation are needed.
116	Total requests for assistance and complaints received in 2018

OIG staff initiate management reviews, investigative reviews and investigations when violations of rule, statute, policy and/or contract requirements are alleged, including those filed under the Whistle-blower’s Act.<sup>1</sup> While investigations are administrative in nature, criminal violations are often discovered during the investigative process. When a determination is made that a potential criminal violation has occurred, the investigation is coordinated with the Florida Department of Law Enforcement (FDLE), the applicable State Attorney’s Office, or other appropriate law enforcement agencies for criminal prosecution.

<sup>1</sup> The Whistle-blower’s Act, §112.3187-112.31895, F.S., is intended to protect current employees, former employees, or applicants for employment with state agencies or independent contractors from retaliatory action. Whistle-blower designation is determined by the OIG in consultation with the Governor’s Chief Inspector General’s office. If a complaint meets whistle-blower criteria, the whistle-blower’s identity is protected from release and an investigation is conducted pursuant to §112.3189, F.S.

# INVESTIGATIONS SECTION

## **INVESTIGATIONS**

The table below provides a summary of the management reviews, investigative reviews, or investigations opened or closed in 2018:

<b>Investigative Activity</b>	<b>Opened in 2015, 2016 or 2017</b>	<b>Closed in 2018</b>
Number of investigations previously referred to law enforcement agencies pending results of their investigation	9	4
<b>Investigative Activity</b>	<b>Opened in 2017</b>	<b>Closed in 2018</b>
Number of complaints resulting in either management review or investigative review	5	5
<b>Investigative Activity</b>	<b>Opened in 2018</b>	<b>Closed in 2018</b>
Number of complaints resulting in management review, investigative review or investigation	16	13

## **FINAL INVESTIGATIVE REPORTS**

Final investigative reports are distributed to the Audit Committee, the Executive Director, and others as needed for review, resolution, and any needed actions. Final investigative reports are also distributed to program leadership responsible for the employee or program investigated for appropriate personnel actions or recommended policy changes. Additionally, the final investigative reports are posted on the Florida Housing website.

<http://www.floridahousing.org/contact-us/inspector-general/investigations>.

## **RECOMMENDED CORRECTIVE ACTIONS**

Based on the investigative findings, the OIG may make recommendations in the form of a corrective action. The recommendations are for the purpose of process improvement and are made to Florida Housing management or contracted providers. The recommendations are tracked by the OIG.





# INVESTIGATIONS SECTION

## **FUNDS RECOVERED AND PENDING RESTITUTION**

<b>Recovered Monies due to OIG Investigative Reviews and Investigations in 2018 by OIG case number and amount recovered</b>		
<b>OIG Case Number</b>	<b>Circumstances of Repayment</b>	<b>Total Amount of Repayment</b>
170120-01	On 5/23/17, they entered into a repayment agreement and the debt was paid off after the sale of the home on 7/11/18.	\$10,631
150421-01	On 7/24/18, the home sold: outstanding balance = \$27,804; \$16,586 was paid; and amount due = \$11,218.	\$16,586
Grand Total:		\$27,217
<b>OIG Case Number</b>	<b>Circumstances of Repayment</b>	<b>Total Amount of Restitution</b>
130729-02 Reliable Business	As a result of the collaborative investigation with the HUD OIG, an individual was charged with: three counts of Theft of Government Property; two counts of Aggravated Identity Theft; one count of False Statements to a Federal Agency; and received a judgement to repay proceeds obtained from the violations.	\$136,950

Note: In 2018, three investigative files<sup>2</sup> were of applicants for HHF Program benefits. As a result of the investigations, these individuals did not receive HHF Program benefits. According to an HHF Program Manager:

None of these were funded (or even sent to their servicer). So, we have no way to know how much they could have received or what programs they would have been approved for. I would say that the maximum they could have [each] received with the UMAP/MLRP programs together was \$42,000 [possible total of 4 x \$42,000 = \$168,000].

In addition, when it is determined that individuals have obtained HHF Program funds based on their fraudulent activities, OIG staff coordinates between, Legal, HHF Program and Loan Servicing staff members to request demand letters be sent to these individuals based on the results of the investigations. In 2018, OIG identified three possible investigative files that will need to have demand letters sent, pending the final results of investigations.

## **SUMMARY OF MANAGEMENT REVIEWS AND INVESTIGATIVE REVIEWS COMPLETED DURING FY 2018**

### **170109-01**

On January 9, 2017, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received an email regarding some concerns a staff member from the Gadsden County Board of County Commissioners (BOCC) had about another staff member receiving home rehabilitation funds through the Special Housing Initiatives Partnership (SHIP) Program. OIG staff obtained relevant information; conducted interviews with the complainant, subject, and witnesses; and coordinated the investigative review with the SHIP Program office and the BOCC. The OIG made several determinations to included that the employee did not receive preferential treatment and that her employment with the County was disclosed on the SHIP application. As a result, the OIG made several best practice suggestions to the SHIP Program office and the BOCC regarding the processing of SHIP applications being submitted by employees, friends, family members or business associates. The County adopted the recommendations and worked with the SHIP Program staff to coordinate training and development of a conflict of interest policy. Therefore, the OIG closed the matter.

<sup>2</sup> The investigative files identified were OIG case numbers: 160909-01; 170321-01; and 171204-01.

# INVESTIGATIONS SECTION

## **170810-01**

On August 10, 2017, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received an anonymous complaint alleging the subject, a Homeownership Assistance Program (HAP) Down Payment Assistance (DPA) recipient, was no longer residing at their former home as required by their participation in the assistance program. OIG staff: coordinated this investigative review with the Clay County Property Appraiser's Office (CCAPO), US Bank and Florida Housing program and loan servicing staff; and obtained relevant information and conducted an interview with the recipient. According to the recipient, they moved out of the home during renovations, listed a different mailing address due to going through a divorce, but stated US Bank was aware of the situation. The enforcement of occupancy requirements of the HAP and homestead exemption are not within the purview of the OIG. A copy of this review was provided to the CCAPO, US Bank and Florida Housing program and loan servicing staff for their review and action deemed appropriate. Therefore, the OIG closed the matter.

## **170815-01**

On August 15, 2017, the Office of Inspector General (OIG) received an anonymous complaint alleging the subjects, Hardest Hit Fund (HHF) Elderly Mortgage Assistance Program (ELMORE) recipients, no longer live in their home and that their son currently lives in it. OIG staff members reviewed pertinent information and coordinated this investigative review with the HHF Program Management. The explanation provided by the HHF Program staff regarding ELMORE is, "Since they borrower is just funded the one time, they state in their docs that they occupy the residence as their principal residence at the time of closing, but there is no other requirement to occupy the residence during the forgiveness period [two years]." Therefore, the OIG closed the matter.

## **171117-01**

On November 17, 2017, Florida Housing Finance Corporation (Florida Housing), Office of Inspector General (OIG) received an anonymous complaint alleging the subject, a Hardest Hit Fund Principal Reduction (HHF-PR) Program recipient, is using the property as a rental unit. OIG staff obtained relevant information, conducted an interview with the subject, and sent this information to the HHF Program Management. The explanation by the HHF program staff regarding HHF PR is, "He needs to have occupied the residence at the time of application and funding. After that, he just needs to own the property for forgiveness. We have never said how long they have to had occupied the residence as their primary residence." Based on the review, it appears that the HHF PR recipient complied with the requirements to occupy the residence at the time of application and funding. Therefore, the OIG closed the matter.



# INVESTIGATIONS SECTION

## **171129-01**

On November 29, 2017, Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a complaint from a private citizen regarding her grandfather, a Hardest Hit Fund (HHF) Program recipient. Specifically, that their elderly grandfather was not living in the home, but was living in an apartment, and they were afraid that some other family members may be responsible. OIG staff: obtained relevant information, conducted interviews of the complainant, HHF Advisor and supervisor; and consulted with the HHF Program management, who explained that the apartment lease was after the HHF Program funding and occupancy is not required for forgiveness. Additionally, OIG staff provided the complainant with several options for assistance. HHF Program Management were provided a copy of the closing memo for their review and action deemed appropriate. Therefore, the OIG closed the matter.

## **180110-01**

On January 10, 2018, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a complaint regarding a potential violence in the work place issue. OIG staff, in conjunction with Human Resources (HR), conducted a review of the matter, which included document reviews and interviews. Based on this information, OIG staff considered this matter to be a grievance, which was not within our purview and referred it for additional review and action deemed appropriate by HR and the Executive Director. Therefore, the OIG closed the matter.

## **180118-01**

On January 18, 2018, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a facsimile (fax) complaint regarding Hardest Hit Fund (HHF) Program recipients and their home. Specifically, neither homeowners were living in the home as they were both at rehabilitation facilities. OIG staff obtained relevant information, conducted separate interviews with the complainant and one of the subjects, and provided the HHF Advisor and HHF Program management with updates concerning this matter. Based on this information, it did not appear that the recipients conducted any fraudulent activity involving their receipt of HHF Program funds. Therefore, HHF Program Management were notified that one of the recipients returned to the home and were provided a copy of the closing memo for their review and action. Therefore, the OIG closed the matter.

## **180223-02**

On February 23, 2018, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a request for assistance from two possible Hardest Hit Fund (HHF) applicants. The complainants were concerned about the actions of an individual who stated that she was an advisor and would help them apply for HHF funding through her business. Based on the results of this review, the individual was not an HHF Advisor or applicant and Florida Housing does not have any jurisdiction over her activities. Due to the individual's activities and in accordance with §20.055(7)(c), F.S., a copy of the closing memo and the documents provided by the complainants, were provided to: the Florida Department of Law Enforcement (FDLE); Jeremy Wade, Senior Fraud Investigator, Office of the Chief Compliance Officer, U.S. Department of the Treasury, Office of Financial Stability; and to representatives from the Investigations Division, Atlanta Office, Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) for their review and consideration. Therefore, the OIG closed the matter.

# INVESTIGATIONS SECTION

## **180309-01**

On March 9, 2018, the Florida Housing Finance Corporation's (Florida Housing) Office of Inspector General (OIG) Systems Auditor informed the Inspector General (IG) of possible misuse of computer equipment. After an analysis of the Security Posture Report (SPR), it appeared that an employee had possibly visited a website(s) that contained potentially pornographic material. The IG met with the Operations Director (OD) and the Chief Information Officer (CIO) and requested a review of the firewall event log. The CIO provided the IG with a report detailing a random sampling of time frames capturing the employee's internet usage which indicated various pornographic sites on multiple occasions had been visited. After a consultation with the Executive Director and OD, the IG made the decision to turn the inquiry over to Florida Housing management for further review and disciplinary action as they deemed appropriate. The employee acknowledged misuse of Florida Housing's property by accessing inappropriate sites and resigned. Therefore, the OIG closed the matter.

## **180425-01**

On April 25, 201, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received an anonymous complaint concerning an individual, who was recently approved to receive Hardest Hit Fund (HHF) Program funds. Specifically, the recipient was reported to have taken a leave of absence from his former employer and should not have qualified for HHF Program assistance. OIG staff obtained relevant information and consulted with a Benefits Services Specialist III, Reemployment Assistance (RA) Communications Unit, the Florida Department of Economic Opportunity. Additionally, this information was provided to Assistant Director of Homeownership, who explained, "We let the UEB [Unemployment Benefits = RA Benefits] monetary determination stand as evidence of hardship through no fault of the applicant. He was approved and has received UEB funds. Unless something happens to change the UEB determination, then there would be no cause to change eligibility determination." Therefore, the OIG closed the matter.

## **180430-01**

On April 30, 2018, Florida Housing Finance Corporation (Florida Housing), Office of Inspector General (OIG) received a request for assistance from the Assistant Director of Operations (ADO). Specifically, the ADO explained that two Florida Housing employees had expressed concerns about two separate incidents involving security officers, contract employees of NAI Talcor (Talcor), the property management company for the City Centre building. OIG staff conducted a review of this matter to include interviews, along with document and video reviews. Based on this information, OIG considered this matter to be a grievance, which is not within our purview. The OIG referred this matter to the ADO and the Operations Director for additional review and coordination with Talcor for action deemed appropriate and communication with Florida Housing employees. Therefore, the OIG closed the matter.

## **180518-01**

On May 18, 2018, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a phone call from a Hardest Hit Fund (HHF) Program applicant who wanted to provide some information about their spouse. The applicant initially stated that they believed that their spouse may have received a settlement from their former job, which was not disclosed on the HHF application. However, right after the phone call, they sent an email stating that it was a misunderstanding and not to report anything. OIG staff obtained relevant information and contacted a representative of the Florida Department of Economic Opportunity, Reemployment Assistance Communication Unit, who stated that the only record they could find was from a small leave payout. The Assistant Director of the Homeowner Programs stated that she did not see any large deposits and that she did not have "any concerns" about the file. Therefore, the OIG closed the matter.



# INVESTIGATIONS SECTION

## **180731-01**

On July 31, 2018, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received an email from the Federal Home Loan Programs Senior Analyst who provided information regarding a Hardest Hit Fund (HHF) Program recipient. She explained that the recipient received assistance on two different occasions, that she entered two different social security numbers (SSN) on her applications, and that she would have only been eligible for one Unemployment Assistance Program (UMAP) payment. Furthermore, the loan was over funded by \$11,531.46 on the second application. OIG staff obtained relevant information, conducted an interview with the subject, and determined that it does not appear that the recipient intentionally tried to alter their SSN or other personally identifiable information (PII) in order to apply for and receive additional HHF Program benefits. The OIG provided a copy of the closing memo to the Federal Home Loan Programs Senior Analyst and Loan Servicing staff for their review, coordination, and response back to the recipient. Therefore, the OIG closed the matter.

## **180904-01**

On September 4, 2018, Florida Housing Finance Corporation (Florida Housing), Office of Inspector General (OIG) received a request for assistance with conducting a management review from the Assistant Director of Operations (ADO). Specifically, an employee expressed concerns about comments made by their supervisor. OIG staff, in conjunction with Human Resources (HR), conducted a review of the matter, which included document reviews and interviews. The OIG considered the allegations to be grievances, not within its purview. As such, the OIG referred the matter for additional review and coordination deemed appropriate by the ADO and Florida Housing Management. Therefore, the OIG closed the matter.

## **181001-01**

On October 1, 2018, Florida Housing Finance Corporation (Florida Housing), Office of Inspector General (OIG) received a request for assistance with conducting a management review of a matter from the Operations Director (OD). Specifically, the OD was informed that an employee recorded a meeting without notifying all meeting participants of the recording. OIG staff conducted interviews and confirmed that a Florida Housing employee had recorded a meeting, without notifying all meeting participants of the recording. Florida Housing does not have a policy pertaining to recording of internal meetings by employees. Based on this review, the OIG provided a copy of the closing memo to the OD, Human Resources and relevant management staff members for review and action deemed appropriate in conjunction with direction from the General Counsel's Office. Therefore, the OIG closed the matter.



# INVESTIGATIONS SECTION



## **SUMMARY OF INVESTIGATIONS AND CORRECTIVE ACTIONS COMPLETED DURING FY 2018**

### **160909-01**

**Allegation:** A Hardest Hit Fund (HHF) Program applicant made false statements and provided falsified documents regarding their spouse's residence on the HHF Program application in order to be found eligible to receive payments from HHF Program funds.

**Finding:** Supported

**Corrective Action:** The investigation was coordinated with the Florida Department of Law Enforcement.

On April 18, 2017, FDLE advised that they would initiate a criminal investigation, which resulted in the following:

- On April 8, 2018, the applicant was charged with:
  - Schemes to Defraud (less than \$20,000);
  - Criminal Use of Personal Identification; and
  - Making False Statement to Obtain Credit-Property.
- On June 4, 2018, the applicant's charges were reduced to one count of Petit Theft and they:
  - Plead no contest;
  - Were granted credit time served of one day;
  - Were placed on six months of probation, with 25 hours of community service; and
  - Were ordered to pay \$1,000 for investigative cost recovery.

The OIG did not have any additional comments or recommendations. The OIG forwarded the investigative report to the U.S. Treasury in accordance with HHF procedures.

# INVESTIGATIONS SECTION

## 170120-01

**Allegation:** A Hardest Hit Fund (HHF) Program recipient committed fraud by failing to notify their HHF Advisor that they had leased their primary residence, during a time period of receiving HHF Program funds. The 2015 HHF Advisor Guide and the HHF Program loan documents require applicants to occupy the property indicated on their HHF application as their primary residence.

**Finding:** Supported

**Note:** On May 23, 2017, Mr. Tekle entered into a repayment agreement with Florida Housing to repay the amount of HHF Program funds that he received after he moved out of the home during the HHF Program funding time period.

**Corrective Action:** The investigation was coordinated with the Florida Department of Law Enforcement. On October 4, 2018, FDLE advised that the State Attorney's Office, 4th Circuit declined to prosecute based on the following:

The discussion I had with ASA Johnston included the criminal history of . . . (one misdemeanor arrest). The repayment of the money outlined in the agreement between Florida Housing Fund and . . . And historically this type of crime would have ended in a restitution agreement if the case had gone through the court system.

ASA David Johnston was very clear the case would be better served through the legal repayment agreement facilitated by The Florida Housing Fund (Hardest Hit Fund Program). The FDLE Case number is JA-73-1771.

The OIG recommended that FDLE take into consideration the repayment agreement with Florida Housing and his complete repayment of the loan totaling \$10,630.80 to Florida Housing on July 11, 2018. The investigative report was forwarded to the U.S. Treasury in accordance with HHF procedures.

## 170321-01

**Allegation:** A Hardest Hit Funds (HHF) Program applicant committed fraud by providing a falsified document and making false statements/certifications on their HHF Program application about circumstances surrounding their termination of employment in order to be found eligible to receive payments from HHF Program funds.

**Finding:** Supported

**Corrective Action:** The investigation was coordinated with the Florida Department of Law Enforcement. FDLE advised that they would not initiate a criminal investigation and stated:

They met w/ the Public Integrity Prosecutor Mark Simpson and he said "no" for prosecuting this one due to . . . not receiving any HHF Program funds. So, they closed their file on 3/27/18.

The OIG does not have any additional comments or recommendations. The investigative report was forwarded to the U.S. Treasury in accordance with HHF procedures.





## 171204-01

**Allegation:** A Down Payment Assistance (DPA) Program recipient and a Hardest Hit Fund (HHF) applicant:

1. Violated the terms of the DPA mortgage received in 2014 because they failed to maintain their primary residence; and
2. Committed fraud by failing to report that they were renting the primary residence, on the HHF Program application or to the HHF Advisor in order to obtain HHF Program funds.

The 2016 HHF Advisor Guide and the HHF Program loan documents require applicants to occupy the property indicated on their HHF Program application as their primary residence.

**Finding:** 1. Supported and 2. Supported

**Corrective Action:** The investigation was coordinated with the Florida Department of Law Enforcement. On November 1, 2018, FDLE advised that the case was reviewed with Assistant State Attorney Michael Hunt and the decision to decline to prosecute was based on the following facts:

The case was reviewed with Assistant State Attorney (ASA) Michael Hunt and the decision to decline the investigation is based upon the following facts: . . . 's limited criminal history, none of which pertained to fraud; . . . 's exclusion from any future FHFC loans or grants; along with the fact that . . . did not actually receive any HHF funds, ASA Hunt reported that the State Attorney's Office would not be inclined to prosecute this matter.

Although Florida Housing does not have jurisdiction over issues related to lenders and their enforcement of mortgage terms, U.S. Bank staff have been monitoring this matter and were notified of the update from the Brevard County Property Appraiser's Office pertaining to them losing homestead exemption status as their investigation revealed the home was a rental. As previously reported above, they are in violation of the terms of the DPA mortgage when they failed to maintain the primary residence.

Regarding their license as a real estate sales person, OIG staff will provide this information to the Florida Real Estate Commission for review and action deemed appropriate. The investigative report was forwarded to the U.S. Treasury in accordance with HHF procedures.



# INTERNAL AUDIT SECTION

## ***INTERNAL AUDIT SECTION***

The Internal Audit Section's primary responsibility is to assist Florida Housing management in determining whether adequate controls exist, and risks are mitigated to ensure the orderly and efficient conduct of business. In addition, Section 20.055(2)(a) and (b), F.S., requires a description of activities related to the development, assessment, and validation of performance measures. These activities are integrated into the audit process.

The Internal Audit Section conducted an audit, which included 14 recommendations for improvement; 10 management reviews; one advisory; and one consulting engagement. A second audit was initiated; however, it was not completed by the end of the fiscal year. Coordination and/or follow-up on three external audits and three internal audit projects were completed. Internal audit reports and advisories are posted on the Florida Housing website.

<http://www.floridahousing.org/contact-us/inspector-general/audits>



# INTERNAL AUDIT SECTION

## **ASSURANCE ENGAGEMENTS**

Assurance engagements are conducted to provide an independent assessment on governance, risk management, and control processes for Florida Housing. The nature and scope of the assurance engagements are determined by the OIG Internal Audit staff and are performed in accordance with the International Standards for the Professional Practice of Internal Auditing (Standards) published by the Institute of Internal Auditors (IIA).

The assurance engagements result in a written report of observations and recommendations, including any response by management. The reports are distributed to the Audit Committee, Executive Director, affected program managers, the Executive Office of the Governor's Chief Inspector General, and the Office of the Auditor General.

## **CONSULTING ENGAGEMENTS**

Consulting engagements provide assistance to Florida Housing management or staff with the intention of improving specific program operations and/or processes. Consulting engagements are usually performed at the request of management, in which the OIG Internal Audit staff agree upon the nature and scope and management. The engagements are performed in accordance with the Standards. The written reports are issued to the affected program management.

## **MANAGEMENT REVIEWS**

Management Reviews are reviews of programs or processes that do not require a complete audit. These reviews may include compliance reviews of Florida Housing contractors or entities under Florida Housing's oversight. Management reviews result in a written report or a letter of observations and recommendations, including responses by management. The Standards are not cited. These reports are typically distributed to the Audit Committee, Executive Director and affected program management. Additionally, certain reports may be sent to the Executive Office of the Governor's Chief Inspector General and to the Office of the Auditor General.

## **SUMMARY OF INTERNAL AUDIT REPORTS COMPLETED DURING FY 2018**

### **2018-06 – Enterprise Information Technology Audit**

In accordance with the OIG's Annual Audit Plan for Fiscal Year 2018, an Enterprise Information Technology Audit was conducted. Florida Housing has a responsibility to safeguard the release of information in a public document that might expose potential IT security vulnerabilities. Internal Audit follows guidance provided by Section 282.318, F.S., providing that findings related to IT security should be considered confidential information and exempt from public disclosure.<sup>3</sup>

## **SUMMARY OF REVIEWS COMPLETED DURING FY 2018**

### **2018-05 – Review of 2017 4th Quarter Performance Measures Review**

### **2018-11 – Review of 2018 1st Quarter Performance Measures Review**

### **2018-12 – Review of 2018 2nd Quarter Performance Measures Review**

### **2018-15 – Review of 2018 3rd Quarter Performance Measures Review**

Section 20.055, Florida Statutes, requires that the OIG perform a validity and reliability assessment of the agency performance measures and, if needed, make recommendations for improvements. The Florida Housing Performance Measures Reports, prepared pursuant to the Affordable Housing Services Contract with the Department of Economic Opportunity (DEO), are reviewed quarterly. These reports contain data pertaining to the performance measures and targets established by Section 420.511(1)(a) through (e), Florida Statutes. The OIG reviewed the performance

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<sup>3</sup> Section 282.318(4)(g) Ensure that periodic internal audits and evaluations of the agency's information technology security program for the data, information, and information technology resources of the agency are conducted. The results of such audits and evaluations are confidential information and exempt from s. 119.07(1), except that such information shall be available to the Auditor General, the Cybercrime Office of the Department of Law Enforcement, the Agency for State Technology, and, for agencies under the jurisdiction of the Governor, the Chief Inspector General.

# INTERNAL AUDIT SECTION

measure data to ensure its accuracy prior to submission of the report to the DEO Executive Director. Each of the OIG's reviews determined that the reports were accurate and supported by the appropriate documentation.

## **2017-11 Identifying New Florida Single Audit Act Projects**

The Office of Inspector General (OIG) issues advisory reports on topics of interest that could significantly impact Florida Housing Finance Corporation's (Florida Housing) programs. Generally, advisory work will consist of research into the authoritative sources (laws, rules and regulations, policies and procedures) and industry accepted best practices or other related information on the subject matter. In this report, the OIG does not render assurances, but provides management with information to improve the process for identifying state projects to which the Florida Single Audit Act (FSAA) requirements apply. The OIG noted that Florida Housing had developed guidelines for identifying new FSAA projects and implementing requirements related to those projects; however, there is not a mechanism in place to ensure that applicable staff are aware of these guidelines.

The following observation was made:

Currently, Florida Housing does not have a process in place to ensure that applicable staff are aware of the internal guidelines for determining the applicability of FSAA to new State appropriations and where those guidelines can be found if needed.

Florida Housing's Finance staff have developed written guidelines for identifying projects to which FSAA apply and implementing the provisions of the FSAA related to those new projects. The guidelines also documented expectations and defined staff's roles and responsibilities. However, if applicable staff are not aware of the guidelines, there is the risk of non-compliance with the requirements of the FSAA.

The following recommendation was made:

To ensure that appropriate steps are taken to identify and implement requirements related to new FSAA projects, the current procedures should be distributed to appropriate staff, periodically discussed with applicable staff, and/or filed in a shared location so they are readily available when needed.

## **COORDINATED EXTERNAL AUDIT REPORTS DURING FY 2018**

Ernst & Young's Audit of Florida Housing's 2017 Financial Statements

U.S. Treasury Follow-up on HHF Compliance Review

## **FOLLOW-UP REVIEWS COMPLETED DURING FY 2018**

Project No. 2017-21 – 2nd Follow-up on the Auditor General Operational Audit (2017-0047)  
Final Status of Audit Findings

Project No. 2018-07 – Immediate Follow-up on OIG Audit of Mortgage Credit Certificate Program

Project No. 2018-08 – 2nd Follow-up on OIG Audit of IT Disaster Recovery Process

Project No. 2018-13 – Follow up on OIG Audit of Mortgage Credit Certificate Program



# INTERNAL AUDIT SECTION

## **SPECIAL PROJECTS AND OTHER PROJECTS**

Services other than assurance engagements, consulting engagements, and management reviews performed by OIG staff members for Florida Housing management or entities outside of Florida Housing, are considered special projects. Special projects may include things such as participation in intra-agency reviews and/or workgroups; or assisting the Governor's office or the Legislature. Special projects may also include atypical activities that are completed within the OIG such as self-assessments or policy revisions. Four examples of special projects are listed below.

### **Lottery Number Assignments**

Lottery numbers<sup>4</sup> are generated to use when tiebreakers are needed by any of Florida Housing's competitive funding applications. Florida Housing's OIG has a process to assign lottery numbers using random numbers generated in Microsoft Excel. The instructions for various Florida Housing competitive funding programs provide that each request for application (RFA) will receive a random lottery number at or prior to the issuance of final scores or ranking. In 2018, OIG staff assigned lottery numbers for the following RFAs listed below:

**RFA 2017-113**  
**RFA 2018-101**  
**RFA 2018-102**  
**RFA 2018-103**

**RFA 2018-104**  
**RFA 2018-106**  
**RFA 2018-107**  
**RFA 2018-108**

**RFA 2018-109**  
**RFA 2018-110**  
**RFA 2018-111**  
**RFA 2018-112**

**RFA 2018-113**  
**RFA 2018-114**  
**RFA 2018-115**  
**RFA 2018-116**

In addition, at the final review committee meeting for each RFA, the OIG verifies the accuracy of the lottery numbers used in the review committee's scoring spreadsheet; and on the applications recommended for funding spreadsheet, which is provided to the Board for approval.

## **Enterprise Risk Assessment and Mitigation**

### **Background**

Florida Housing's Strategic Plan includes the following goal: "Establish an environment in which risk assessment and mitigation is integrated into all business practices and decisions." While the management and assessment of risk is the primary responsibility of each business unit, an Enterprise Risk Assessment (ERM) project team was tasked with creating a policy and the related process that will help integrate enterprise risk management into business processes, ultimately creating the "environment" (i.e. corporate culture) sought in the Strategic Plan. That ERM project was completed in 2016 and is currently being utilized to assess, identify, mitigate and monitor risk throughout Florida Housing's business units.

The OIG plays a vital role in Florida Housing's ongoing ERM efforts by collecting, compiling and analyzing the data throughout the year. As the process continues to mature, the data gathered will continue to expand and offer greater insight into the key risk drivers for each business unit. Additionally, the OIG uses the associated data gathered through the ERM process as a component of its annual risk assessment process, which is used to develop the subsequent years audit plan.

### **Legislative Tracking**

The OIG conducts bill analysis and monitors/tracks legislative actions related to Florida Housing and the Inspector General community.

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<sup>4</sup> The term "lottery number" used by Florida Housing does not refer to the commonly known lottery process.

# INTERNAL AUDIT SECTION

## **Risk Assessment and Development of Annual Audit Plan**

In accordance with Section 20.055, F.S., the OIG performed a risk assessment of Florida Housing's programs and activities to assist in the development of the Annual Audit Plan. The risk assessment process included identifying programs and activities performed by Florida Housing; interviewing managers to gather their perspectives on Florida Housing's current risks and exposures; addressing concerns of the Audit Committee members; identifying applicable risk factors (such as compliance risk, financial risk, reputational risk, etc.); and determining the risk ranking for selected programs and activities. The risk ranking of each program and activity was reviewed and evaluated by the OIG and used to develop the Annual Audit Plan.

The 2018 Annual Audit Plan identified the programs and activities to be audited or reviewed. The plan established the priorities of the Internal Audit staff while optimizing the use of internal audit resources and allowing the OIG to add value to Florida Housing. The plan also included audit issues that may be addressed in FY 2019 and FY 2020. The Audit Committee and Board approved the audit plan.



# INTERNAL AUDIT SECTION

## OFFICE OF INSPECTOR GENERAL FY 2018 INTERNAL AUDIT PROJECTS

Project Number	Project Type	Project Name	Final Report Issued
2017-07	Consulting Engagement	ITS Security Framework Review	Report Completed
2017-11	Advisory	Review of Compliance with the Florida Single Audit Act	Advisory Issued 11/29/2018
2017-14	Audit	Audit of Mortgage Credit Certificate Program	Report Issued 1/23/2018
2017-16	Special Project	Implementation of the Revised Internal Auditing Standards	In Progress
2017-19	Special Project	Advisory on Follow-up on Monitoring Observations	Project Terminated 1/24/2018
2017-20	Special Project	2017 Risk Assessment and Development of 2018 Audit Plan	Plan Issued 1/25/2018
2017-21	Management Review	2nd Follow-up on AG Operational Audit	Memo Issued 12/12/2017 and 11/28/2018
2018-01	Special Project	OIG Admin (staff meetings; P&P reviews; Annual Report; etc.)	Closed 12/31/2018
2018-02	Special Project	Random Number Generator	Closed 12/31/2018
2018-03	Special Project	Non-HHF Investigative Activity	Closed 12/31/2018
2018-04	Special Project	Assist EOG-CIG: Opa-Locka Financial Emergency Oversight Board	Closed 12/31/2018
2018-05	Management Review	Review of 2017 4th Quarter Performance Measures Report	Memo Issued 1/30/2018
2018-06	Audit	Enterprise IT Audit	Report Issued 11/15/2018
2018-07	Management Review	Immediate Follow-up on the Audit of Mortgage Credit Certificate Program	Memo Issued 3/2/2018
2018-08	Management Review	2nd Follow-Up on Audit of IT Disaster Recovery Process	Memo Issued 12/18/2018
2018-09	Management Review	Review of IT Incident Response	Closed 2/21/2018
2018-10	Audit	Audit of Ethical Climate	In Progress
2018-11	Management Review	Review of 2018 1st Quarter Performance Measures Report	Memo Issued 4/30/2018
2018-12	Management Review	Review of 2018 2nd Quarter Performance Measures Report	Memo Issued 7/30/2018
2018-13	Management Review	Follow-up for the Audit of Mortgage Credit Certificate Program	Memo Issued 8/31/2018
2018-14	Special Project	2018 Risk Assessment and Development of 2019 Audit Plan	Pending Audit Committee Approval
2018-15	Management Review	Review of 2018 3rd Quarter Performance Measures Report	Memo Issued 8/31/2018
2018-16	Special Project	Coordinate E&Y Financial Statement Audit	E&Y Audit Report Issued 06/14/2018
2018-17	Special Project	Assistance Re: SHIP	Closed 12/31/2018
2018-18	Special Project	Tracking Legislation	Closed 12/31/2018

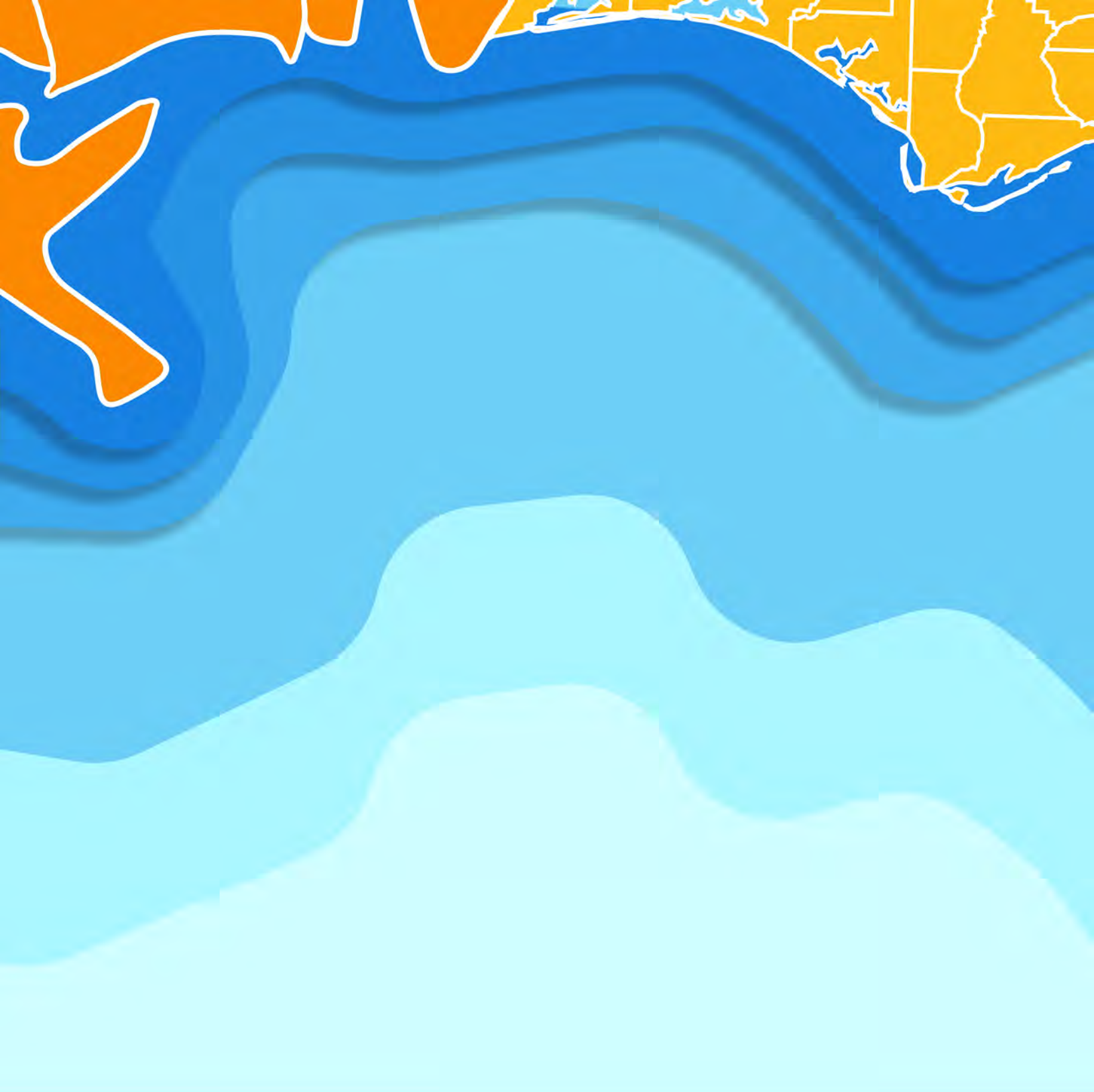
# OIG INITIATIVES

Since the start of the 2018 fiscal year, the OIG has continued and began several projects to improve the efficiency and effectiveness of the office. The OIG is working diligently to meet its statutory mandates and fulfill its mission of “Enhancing Public Trust in Florida’s Affordable Housing.” These projects include:

- The OIG, in collaboration with the Office of General Counsel, conducted several training sessions on Fraud and Ethics for all Florida Housing staff members.
- The OIG completed follow-up activities related to the Auditor General’s 2016 Operational Audit of Florida Housing.
- The OIG will continue to work with the Governance Committee to monitor the implementation and effectiveness of the Enterprise Risk Management process.
- Due to the Governor’s mandate on sexual harassment and trainings, Executive Order 17-319 Preventing Sexual Harassment in State Agencies, the OIG has been working with the Human Resources office, to review, revise, and implement training for Florida Housing’s Sexual Harassment Policy, 2.11.



This report was prepared by the Office of Inspector General at the Florida Housing Finance Corporation, in compliance with Section 20.055(8)(b), Florida Statutes, which states: The inspector general of the Florida Housing Finance Corporation shall, not later than 90 days after the end of each fiscal year, prepare an annual report summarizing the activities of the office of inspector general during the immediately preceding fiscal year.



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