



Office of the Inspector General Advisory #19

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SUBJECT: Historical Housing Quality Standards (HQS) Inspection Results
Associated to New Units when Participants Move

Condition

During participant relocations, historical unit HQS inspection records were updated in Yardi to reflect the new unit's unique Yardi code rather than accurately retaining the original unit code.

Condition Research

An OIG review of system documentation and audit logs identified a function within Yardi as the probable cause of this condition. Follow-up inquiries with Nan McKay & Associates (NMA) and Housing Choice Voucher (HCV) compliance personnel confirmed that the condition and function was first discovered following a major Yardi Voyager 7s upgrade that occurred in October 2018. HCV and NMA escalated the matter to Yardi representatives and updated their training material related to participant unit transfers to ensure inspection records retain the original unit code. During initial follow-up and walkthroughs, HCV department management readily acknowledged the identified condition and committed to seeking [a] viable resolution(s).

Condition Assessment

Based on Yardi database queries¹, 18,975 participant relocations occurred from October 1, 2017 through September 30, 2020 with 800 relocations (4.2%) having historical inspection records associated to the participant's new units. Of the 800 relocations identified, 5,453 historical inspection records had been associated to the participants' new units. This equates to an average of 2.67 years of historical inspection records per unit impacted.

In addition, 470 inspection records had their Tenant ID information modified well after the original inspection date. All the modified records had participants associated to the respective units before their actual occupancy dates.

¹ Database query source code and test results are available for review upon request

Condition Risks and Concerns

The OIG has identified the following risks and concerns with respect to HQS inspection records that reflect an incorrect unit and / or tenant code:

1. Scheduling and performing unneeded HQS annual / biennial inspections prematurely – Of the 800 relocations assessed, 35 annual inspections were scheduled, with 21 of them performed (the remainder were cancelled) within 200 days following the participants' move in dates.
2. Erroneously applying HAP abatements for failed HQS inspections – The OIG identified two instances where abatements were applied for HAP payments of participants' new units, when the corresponding failed inspections related to the participants' old units.
3. Subsequent participant relocations perpetuating the incorrect association of unit inspection records – During testing, the OIG noted the following occurrence:
Participant Smith moved into new unit, ABC. When transferred, seven (7) inspection records for the previous unit, XYZ were erroneously associated with the new unit (ABC).

Later, participant Jones, moved into participant Smith's previous unit, XYZ. When transferred, 28 inspection records representing occupancy at two previous units were erroneously associated with the new unit, XYZ

4. Lack of data accuracy and compromised integrity – Overall concerns of this condition include:
 - Inspection results are not reflective of the correct unit – For the 800 relocations identified, some (if not all) of the participant's historical unit inspection records reflect another unit's inspection results.
 - Historical unit inspection records for reoccupied units are not available - Of the 800 relocations assessed, 170 units have been re-occupied by new participants. Other than initial inspections related to the reoccupation, 1,230 historical records for those units are now incorrectly linked to the prior occupant's new unit.
 - Inspection records are modified to indicate an incorrect Tenant ID – Of the 470 records identified, 84 inspection results are an inaccurate representation of the participant's HQS performance (e.g. "Tenant Fail", "Fail Both", "No Show" conclusions). On average, the records identified were modified 1,136 days after the actual inspection had been performed.

OIG Condition Recommendations

With respect to the risks and concerns identified, the OIG recommends that the HCV department implement a prioritized approach to first mitigate and eventually remediate this condition. As such, the recommendations are:

1. Continue to engage CHA Information Technology (IT) and / or Yardi to disable, restrict or correct undesirable "Transfer to Property" options and / or functionality.
2. Disable or restrict the ability for CHA associates to modify inspection records based on an established age threshold.
3. Determine whether the inspection records impacted should be updated to reflect their original, valid unit. If so, engage IT and / or Yardi to perform the necessary maintenance.