

# Office of Inspector General City of Jacksonville, Florida



Management Review  
Jacksonville Housing Authority  
Unreported Income Exceeding \$2,000  
2025-0034

December 3, 2025

---

Matthew J. Lascell  
Inspector General

## Executive Summary

In April 2025, the Office of Inspector General (OIG) initiated a review to determine whether the Operations Compliance Department (OCD) within the Jacksonville Housing Authority (JHA) (collectively “JHA”) followed its internal policies regarding program fraud/abuse by families who failed to report their income within JHA programs: Public Housing, Section 8, and Rental Assistance Demonstration (RAD). The OIG’s review focused on referrals received, closed, and identified by JHA as program fraud/abuse, specifically, unreported income exceeding \$2,000 from March 2023 through April 2025. Based on this review, the OIG determined that the following policy violations occurred within JHA programs, while different policies were in effect:

### Public Housing:

- Repayment agreements exceeded the \$2,000 threshold.
- Exceptions were not documented properly by JHA leadership.
- Multiple repayment agreements with families.
- Repayment agreements did not contain the required provisions.

### Section 8 and RAD:

- Repayment agreements did not contain the required provisions.

## Background

JHA is an independent agency that provides housing assistance for eligible low-income individuals and families throughout Jacksonville. As one of the largest public housing authorities in Florida, it serves 32,000 people in over 10,000 households. It is led by the Chief Executive Officer (CEO)/President and overseen by the JHA Board of Commissioners, which consists of Mayoral-appointed, unpaid members. The JHA OCD is responsible for investigating and addressing fraud/abuse by families within the JHA programs.

## Issues, Governing Directives, and Findings

Whether JHA followed their internal policies regarding program fraud/abuse by families who failed to report their income exceeding \$2,000 within JHA programs.

### JHA Records related to Public Housing

The OIG reviewed the following JHA Admissions and Continued Occupancy Policies (ACOPs) that govern Public Housing:

JHA Policies	Effective Dates
Admissions and Continued Occupancy Policy (ACOP 2021)	October 1, 2021
Admissions and Continued Occupancy Policy (ACOP 2023)	October 1, 2023
Admissions and Continued Occupancy Policy (ACOP 2024)	October 1, 2024

The OIG reviewed JHA records that indicated the following number of referrals were received, closed, and identified by JHA as unreported income exceeding \$2,000 by families from March 7, 2023, through April 16, 2025:<sup>1</sup>

JHA Policies	Referrals Received	Referrals Closed
ACOP 2021	10	6
ACOP 2023	13	13
ACOP 2024	8	12
<b>Total</b>	<b>31</b>	<b>31</b>

Overall, the 31 referrals ranged from approximately \$2,090 to \$16,422 in program fraud/abuse funds.

### ***JHA Referrals Records – ACOP 2021***

The OIG reviewed JHA records related to program fraud/abuse exceeding \$2,000 by Public Housing families who failed to report their income. The OIG focused on referrals that resulted in repayment agreements while the ACOP 2021 was in effect. Based on interviews and records reviewed, the OIG determined the following:

ACOP 2021 stated, *“The maximum amount for which the JHA will enter into a repayment agreement with a family shall be \$2,000.00.”* The OIG found two referrals that resulted in JHA entering into repayment agreements with the families exceeding the \$2,000 threshold.

ACOP 2021 stated, *“Any exception to this policy must have approval from the Vice President of Housing Management, the Director of Operations Compliance, or any higher level.”* The OIG determined repayment agreements with families exceeding \$2,000 required approval by the Vice President of Housing Management, the Director of Operations Compliance, or any higher level. Of the two above-mentioned referrals, the OIG found that only one referral contained a corresponding memo in Yardi Systems (Yardi)<sup>2</sup> dated May 24, 2023, indicating that the former Interim CEO/President and former OCD Manager gave special permission in relation to a family’s repayment agreement. Of note, this memo was input by the Compliance Processor, rather than the former Interim CEO/President and former OCD Manager.

### ***JHA Referrals Records – ACOP 2023***

The OIG reviewed JHA records related to program fraud/abuse exceeding \$2,000 by Public Housing families who failed to report their income. The OIG focused on referrals that resulted

<sup>1</sup> Closed means that JHA’s investigation concluded and identified program fraud/abuse, and further actions by JHA to recover the fraudulent funds occurred.

<sup>2</sup> Yardi is an investment, asset, and property management software vendor for the real estate industry. It provides products such as property management platforms and software.

in repayment agreements while the ACOP 2023 was in effect. Based on interviews and records reviewed, the OIG determined the following:

ACOP 2023 stated, *“Any repayment agreement between the JHA and a family must be signed and dated by the JHA and by the head of household and spouse/cohead (if applicable).”* The OIG found one referral that resulted in JHA entering into a repayment agreement with the adult daughter of the head of household (HOH). A corresponding memo in Yardi dated February 12, 2024, indicated that the former OCD Manager gave permission to HOH’s adult daughter to enter into a repayment agreement with JHA, due to the HOH being hospitalized.

This memo also stated, *“Once HOH is released from the hospital and is able to travel, we will require a new repayment agreement to be signed unless adult daughter becomes HOH or CoHead.”* Of note, this memo was input by the Compliance Processor, rather than the former OCD Manager. Ultimately, JHA did not provide the OIG with any records indicating that the adult daughter became the HOH or Cohead.

ACOP 2023 stated, *“Notice PIH 2017-12 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:*

- *A reference to the items in the public housing lease that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act*
- *A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the PHA the monthly tenant rent*
- *A statement that the terms of the repayment agreement may be renegotiated if the family’s income decreases or increases*
- *A statement that late or missed payments constitute default of the repayment agreement and may result in termination of tenancy”*

The OIG reviewed the repayment agreement being utilized by JHA during this timeframe and moving forward, specifically the JHA Housing Management Division, Debt Resolution Program Repayment Agreement, dated September 27, 2023 (ACOP Repayment Agreement). The OIG determined the ACOP Repayment Agreement did not contain the following required provisions in accordance with ACOP 2023:

- A reference to the items in the public housing lease that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act.
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the PHA the monthly tenant rent.

Ultimately, the OIG found ten repayment agreements utilizing the ACOP Repayment Agreement without the required provisions.

### ***JHA Referrals Records – ACOP 2024***

The OIG reviewed JHA records related to program fraud/abuse exceeding \$2,000 by Public Housing families who failed to report their income. The OIG focused on referrals that resulted in repayment agreements while the ACOP 2024 was in effect. Based on interviews and records reviewed, the OIG determined the following:

ACOP 2024 stated, *“The JHA generally will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family, or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution.”* The OIG found four referrals that resulted in JHA entering into two different repayment agreements with each family. Of note, JHA had already entered into a repayment agreement with some families in previous years, but later JHA entered into a second repayment agreement with families while ACOP 2024 was in effect.

ACOP 2024 stated, *“Notice PIH 2018-18 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:*

- *A reference to the items in the public housing lease that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act*
- *A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the PHA the monthly tenant rent*
- *A statement that the terms of the repayment agreement may be renegotiated if the family’s income decreases or increases*
- *A statement that late or missed payments constitute default of the repayment agreement and may result in termination of tenancy”*

The OIG reviewed and determined that JHA continued to utilize the ACOP Repayment Agreement, which did not contain the following required provisions in accordance with ACOP 2024:

- A reference to the items in the public housing lease that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act.
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the PHA the monthly tenant rent.

Ultimately, the OIG found twelve repayment agreements utilizing the ACOP Repayment Agreement without the required provisions.

**JHA Records related to Section 8 and RAD**

The OIG reviewed the following JHA Housing Choice Voucher Program Administrative Plans (Admin Plans) that govern Section 8 and RAD:

JHA Policies	Effective Dates
Housing Choice Voucher Program Administrative Plan (Admin Plan 2023)	October 1, 2023
Housing Choice Voucher Program Administrative Plan (Admin Plan 2024)	October 1, 2024

Both Admin Plan 2023 and 2024 stated, *“Notice PIH 2018-18 requires certain provisions, at a minimum, be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:*

- *A reference to the items in the family briefing packet that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act*
- *A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the owner the family’s monthly share of the rent to owner*
- *A statement that the terms of the repayment agreement may be renegotiated if the family’s income decreases or increases*
- *A statement that late or missed payments constitute default of the repayment agreement and may result in termination of assistance”*

The OIG reviewed the repayment agreement being utilized by JHA, specifically the JHA Housing Management Division, Debt Resolution Program Repayment Agreement, dated September 27, 2023 (Admin Plan Repayment Agreement). The OIG determined the Admin Plan Repayment Agreement did not contain the following required provisions in accordance with Admin Plan 2023 and 2024:

- A reference to the items in the family briefing packet that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family’s action or failure to act.
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the owner the family’s monthly share of the rent to owner.

***Recovery of Program Fraud/Abuse Funds***

As a result of the OIG's efforts and review, JHA sent three referrals totaling \$16,546, and is in the process of sending ten referrals totaling \$54,577 to a collections agency in accordance with their respective policies. Collectively, JHA sent and will be sending thirteen referrals totaling \$71,123 to the collections agency.

**Recommended Corrective Actions**

1. Ensure that program fraud/abuse referrals are being handled and concluded in accordance with their respective policies.
2. Establish policies to create thresholds for repayment agreements with alternatives to recover program fraud/abuse funds.
3. Establish policies to require that exceptions are approved by JHA leadership.
4. Update the ACOP Repayment Agreement to include the required provisions in accordance with the ACOP.
5. Update the Admin Plan Repayment Agreement to include the required provisions in accordance with the Admin Plan.

**Management's Response**

The OIG provided JHA with an opportunity to submit a written response to the findings in this investigative report within ten (10) business days. Their response is attached to this report.

**Inspector General Standards**

This report/review has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles and Quality Standards for Investigations.

*"Enhancing Public Trust in Government Through Independent and Responsible Oversight"*

---



1300 Broad Street N  
Jacksonville, FL 32202

Phone: 904-630-3810

[JaxHA.org](http://JaxHA.org)   

December 3, 2025

Christina Gatto, MPA, CIGI  
Investigative Coordinator  
Office of Inspector General  
City of Jacksonville  
231 East Forsyth Street, Suite 470  
Jacksonville, FL 32202

**Subject:** Response to Review of Program Fraud/Abuse – Unreported Income Exceeding \$2,000 (March 2023 – April 2025)

Dear Christina Gatto,

The Jacksonville Housing Authority (JHA) acknowledges receipt of the Office of Inspector General's review regarding program fraud and abuse related to unreported income exceeding \$2,000 during the period of March 2023 through April 2025. As the new CEO of JHA, swift actions have been taken to immediately address each matter including but not limited to: Extensive departmental training, hiring an industry best practice skilled Compliance Manager, streamlining internal JHA processes and controls, and implementing new compliance job descriptions to combat matters of fraud and abuse by program participants. We truly appreciate the recommendations provided by OIG and have taken the following proactive steps to implement corrective measures:

In alignment with the recommended corrective action plan, JHA has established the following:

1. Referral Handling and Conclusion: We have implemented checks and balances to ensure that all program fraud/abuse referrals are handled and concluded in strict accordance with JHA policies and procedures.
  - JHA has written an entire new ACOP policy and procedural guide to address program fraud and abuse by program participants.
  - The new ACOP was published on November 8, 2025, and is currently within the 45-day public comment period. This will be presented for JHA's Board of Commissioners for an anticipated adoption on January 26, 2026.
2. Thresholds for Repayment Agreements: Policies have been developed to create clear thresholds for repayment agreements, including alternatives for recovering program fraud/abuse funds.
  - JHA has developed new templates for repayment agreements
  - JHA will end its collection agreement with 3rd party vendor via a notification and commence program collections internally for amounts less than \$2,000.
  - JHA will be working closely to provide OIG tenant repayments that are \$2,000 or more to assist in larger collections of federal fund reimbursement and to reduce the need for 3<sup>rd</sup> party collection agency cost to JHA.
  - JHA will be working with both HUD OIG and the City of Jacksonville OIG to establish a video training on Fraud and abuse for all new program participants. These trainings will be administered during the program participant initial briefing and recertification process. Launch 1<sup>st</sup> Qtr. 2026
3. Leadership Approval for Exceptions: JHA now requires that any exceptions to repayment agreements or recovery processes receive formal approval from JHA leadership.



- Exception request must be detailed in a written memo with explanation and evidence by the submitter. Submittals must be sent through a secure signatory source including but not limited to: Docusign, Adobe system prior for the approval or denial by JHA leadership for record retention.
4. ACOP Repayment Agreement Updates: The ACOP Repayment Agreement has been updated to include all required provisions in accordance with the Admissions and Continued Occupancy Policy (ACOP).
    - JHA has written an entire new ACOP policy and procedural guide to address program fraud and abuse by program participants.
    - The new ACOP was published on November 8, 2025, and is currently within the 45-day public comment period. This will be presented to JHA's Board of Commissioners for an anticipated adoption on January 26, 2026.
  5. Administrative Plan Updates: Similarly, the Administrative Plan Repayment Agreement has been revised to ensure compliance with the Administrative Plan requirements.
    - JHA has written an entire new Admin Plan policy and procedural guide to address program fraud and abuse by program participants.
    - The new Admin Plan policy was published November 8, 2025, and is currently within the 45-day public comment period. This will be presented for JHA's Board of Commissioners for an anticipated adoption on January 26, 2026.

To ensure ongoing compliance and effectiveness of these measures, JHA has implemented the following monitoring procedures:

- Quarterly Compliance Audits: Internal audits will be conducted every quarter to review all program fraud/abuse referrals, repayment agreements, and exception approvals for adherence to policy.
- Monthly Reporting: A monthly compliance report will be generated and reviewed by the Operations Compliance Manager and submitted to JHA leadership for oversight.
- Random Case Reviews: Random sampling of closed fraud/abuse cases will be performed to verify proper documentation and resolution in accordance with ACOP and Administrative Plan provisions.
- Leadership Review Meetings: JHA leadership will convene bi-annually to assess trends, identify gaps, and approve any policy adjustments needed to strengthen fraud prevention and recovery processes.
- Training and Policy Updates: 1) JHA is currently taking swift actions under new leadership. 1) Staff will receive annual training on fraud detection, referral handling, and repayment agreement procedures. 2) Policies will be reviewed and updated as necessary to maintain compliance with federal, state and local regulatory compliance. 3) JHA will develop a new job description with updated skill requirements to backfill Compliance vacant position(s).

These measures reflect JHA's commitment to maintaining program integrity and ensuring compliance with federal state and local regulations.

We believe these actions address the concerns outlined in your review and we will continue to strengthen our internal processes and controls. Please let us know if additional information or documentation is required. We value your partnership in safeguarding program integrity and look forward to continued collaboration.

Sincerely,

Cheron Corbett  
President & CEO  
Jacksonville Housing Authority

C: Roslyn Mixon-Phillips, COO  
Pauline Olden, OCM  
Adina Teodorescu, CFO  
File