



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

OFFICE OF  
INSPECTOR GENERAL

OIG-CA-26-025  
March 12, 2026

## **Emergency Rental Assistance (ERA1) Program Notice of Recoupment – City of Houston, Texas**

### Summary

The ERA1 statute (codified at 15 USC § 9058a) directs the Department of the Treasury (Treasury) to make allocations and payments to eligible grantees such as States and local governments, who in turn, make funding available in the form of rental assistance to eligible households. The statute also directs the Treasury Office of Inspector General (OIG) to conduct monitoring and oversight of the receipt, disbursement, and use of funds made available to grantees. As part of this oversight authority, if OIG determines that a grantee failed to comply with the use of funds requirements in the statute, the amount equal to the amount of funds used in violation shall be booked as a debt of such entity owed to the Federal Government.

The City of Houston, Texas (Houston) is a recipient of funds under the ERA1 statute. During our desk reviews of Houston and Harris County, Texas, we identified 21,123 potential duplicative ERA1 payments in grantee-submitted data through December 2021. We then selected a non-statistical sample of 50 beneficiaries from those payments for further review. We identified duplicative assistance, assistance exceeding 15 months, payments for ineligible expenses, or other payment errors relating to 21 of the 50 beneficiaries, totaling \$110,928 of overpayments in violation of the requirements included in the ERA1 statute codified at 15 U.S.C. § 9058a (c), Use of Funds. Based on our review, we determined that Houston's ERA1 program paid ERA1 funds totaling \$30,981 in violation of the ERA1 statute because the funds were disbursed to ineligible households as discussed in the attached OIG Notice of Recoupment (Notice). The Notice established a debt to the Federal Government for which Treasury's Bureau of the Fiscal Service issued an invoice for \$30,981 to Houston on March 11, 2026.

We provided Houston an opportunity to comment on a draft of the Notice and its written response and our evaluation of that response is also included in the Notice.

We conducted our review from May 2022 to August 2025. We inquired of the grantee and other relevant parties, reviewed related documentation, and performed other appropriate procedures. During our review of one case, we noted certain matters that we have referred to the OIG Office of Investigations. We believe the evidence obtained is sufficient and appropriate to provide a reasonable basis for our determination in this Notice.

In conducting our review, we followed the OIG's system of quality management to ensure that the information in this report is accurate. We also followed the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Federal Offices of Inspector General which require that our work adheres to its general standards for integrity to include objectivity, independence, professional judgment, and confidentiality as well as its general standard for receiving and reviewing allegations.

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OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

## Notice of Recoupment

### Emergency Rental Assistance

**Division N, Title V, Subtitle A, § 501 of the Consolidated Appropriations Act, 2021  
(Pub. L. No. 116-260), Dec. 27, 2020, and codified at 15 USC § 9058a (ERA1)**

February 27, 2026

Grantee: City of Houston, TX

Points of Contact: Tandra Johnson, ERA Reporting  
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(832) 394-6242

Derek Sellers, Deputy Director  
[Derek.Sellers@houstontx.gov](mailto:Derek.Sellers@houstontx.gov)  
(832) 394-6239

Mailing Address: 2100 Travis St, 9<sup>th</sup> Floor, Houston, TX 77002

Federal Award Identification Numbers: ERA0038

Recoupment Amount: \$30,981

#### Background/Legal Authority

Under the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds, an eligible grantee shall only use ERA1 award funds to provide financial assistance and housing stability services to eligible households. The financial assistance includes: the payment of rent; rent arrears; utilities and home energy costs; utilities and home energy costs arrears; and other expenses related to housing incurred due, directly or indirectly, to the COVID-19 outbreak, as defined by the Secretary of the Department of the Treasury (Treasury). Such assistance shall be provided for a period not to exceed 12 months except that grantees may provide assistance for an additional 3 months to ensure housing stability (subject to availability of funds). The ERA1 statute at 15 U.S.C. § 9058a(c)(2)(B)(i) allows for up to 3 months (with exceptions) for prospective rent payments within the 12 or 15 months total assistance limitation.

The ERA1 statute at 15 U.S.C. § 9058a(k)(3)(A) defines eligible household as a household of one or more individuals who are obligated to pay rent on a residential dwelling and with respect to which the eligible grantee involved determines: that

(1) one or more individuals within the household has (a) qualified for unemployment benefits or (b) experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak, which the applicant shall attest in writing; (2) one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include a past due utility or rent notice or eviction notice; unsafe or unhealthy living conditions; or any other evidence of such risk, as determined by the eligible grantee involved; and (3) the household has a household income that is not more than 80 percent of the area median income for the household. The grantee must also ensure that, to the extent feasible, any rental assistance provided to an eligible household is not duplicative of any other federally funded rental assistance provided to such household.

Pursuant to the ERA1 statute at 15 U.S.C. § 9058a(e)(2), the last day of the period of performance for grantees that received ERA1 reallocated funds is December 29, 2022.

The ERA1 statute at 15 U.S.C. § 9058a(i), Inspector General Oversight; Recoupment, directs that the Treasury Office of Inspector General (OIG) conduct monitoring and oversight of the receipt, disbursement, and use of funds made available under the ERA1 program. As part of this authority, if OIG determines that a grantee failed to comply with the use of funds requirements in the ERA1 statute (15 U.S.C. § 9058a(c)), the amount equal to the amount of funds used in violation of 15 U.S.C. § 9058a(c) shall be booked as a debt of such entity owed to the Federal Government. Amounts recovered shall be deposited into the general fund of the Treasury.

### Facts and Analysis

As part of our desk reviews of the City of Houston (Houston) and Harris County, TX (the grantees),<sup>1</sup> we identified 21,123 potential duplicative ERA1 payments in grantee-submitted data through December 2021. We then selected a non-statistical sample of 50 beneficiaries from those payments for further review. We identified duplicative assistance, assistance exceeding 15 months, payments for ineligible expenses, or other payment errors relating to 21 of the 50 beneficiaries, totaling \$110,928 of overpayments in violation of the requirements included in the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds. We worked with the grantees to confirm the payment exceptions and issued a report discussing that work in detail.<sup>2</sup>

We communicated our results and observations to the grantees relating to the \$110,928 in overpayments we identified. In response, grantee management

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<sup>1</sup> Houston and Harris County jointly ran their Emergency Rental Assistance Program; however, the grantees maintained separate funding and reporting functions.

<sup>2</sup> Treasury OIG, *Emergency Rental Assistance: Desk Review of Emergency Rental Assistance Payments Made by Houston, TX and Harris County, TX*, OIG-CA-24-029 (September 26, 2024).

informed us that they are pursuing recoupment of overpayments from the payees and initiating an internal review of supporting eligibility documentation. The grantees also recharacterized<sup>3</sup> \$12,686 of the \$110,928. As a result, \$98,242 remains as ineligible ERA1 payments from our review.

Of the \$98,242, we determined that Houston issued financial assistance totaling \$30,981 in violation of the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds. A separate recoupment notice will be issued to Harris County for the remaining ineligible ERA1 payments.<sup>4</sup> Houston's cases 1 through 9 are summarized below.

1. Houston Case 1

Case number (no.): (b) (6)

Amount: \$20,000

Assistance invoice nos.: (b) (6)

Use of funds violation: Ineligible payment

The supporting documentation for case no. (b) (6) is insufficient. The case file includes a document titled "Applicant Rental Verification Request Form" with which a tenant authorizes a landlord to obtain information on the prospective tenant by asking the previous landlord questions related to the tenant's prior residency. This document is not an acceptable item for proof of residence according to both Treasury and the Houston-Harris ERA Program guidance. Treasury guidance states that if grantees are unable to obtain a signed current lease, the grantee may accept evidence of paying utilities, an attestation by a landlord, or other reasonable documentation. Houston-Harris further refined Treasury's guidance for establishing proof of residence to include obtaining a current photo identification with the address of the rental unit; a current utility bill; a lease; or mail from a government office, financial institution, or utility provider to the applicant at the rental unit address. Also, the document was not an adequate substitute for documentation that establishes a

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<sup>3</sup> According to Department of the Treasury, "Emergency Rental Assistance Frequently Asked Questions" (May 10, 2023), <https://home.treasury.gov/system/files/136/FAQs-05102023.pdf> (accessed October 26, 2023), question 45, there may be cases in which a grantee discovers that a household has received ERA assistance from multiple grantees intended to cover the same period of rent, utilities, rental arrears, or utility arrears. In such cases, assuming certain conditions are met, the grantee may decline to recover its payment and instead recharacterize it as assistance covering a different period of eligible rental or utility expenses.

<sup>4</sup> We determined \$67,261 of \$98,242 was subject to recoupment from Harris County. In February 2024 and September 2025, Harris County returned \$2,249 and \$3,040, respectively, to Treasury. As such, the remaining recoupment amount is \$61,972.

definitive existing rental agreement or leasehold between the tenant and the landlord or that the applicant resided at the property.

Houston paid the household \$2,000 in financial assistance per month for 10 months from September 2020 through June 2021, under case no. (b) (6). We found the assistance Houston provided under case no. (b) (6) was ineligible because Houston did not have an acceptable proof of residence document in accordance with Houston-Harris ERA Program guidelines. Thus, we determined the applicant was not eligible for assistance and that Houston provided ERA1 funds for 10 months of financial assistance in the amount of \$20,000 in violation of the Use of Funds statute.

2. Houston Case 2

Case no.: (b) (6)

Amount: \$2,334

Assistance invoice nos.: (b) (6), and (b) (6)

Use of funds violation: Duplicate assistance

Houston paid financial assistance to the same household twice for the months of February, March, and April 2021, under case no. (b) (6). Thus, we determined that Houston provided duplicate ERA1 financial assistance for 3 months at the monthly rate of \$778 for the total amount of \$2,334 in violation of the Use of Funds statute.

3. Houston Case 3

Case no.: (b) (6)

Amount: \$2,040

Assistance invoice nos.: (b) (6) and (b) (6)

Use of funds violation: Duplicate assistance

Houston paid financial assistance to the same household twice for the months of March and April 2021 under case no. (b) (6) for one applicant and under case no. (b) (6) for another applicant. Thus, we determined that Houston provided duplicate ERA1 financial assistance for 2 months at the monthly rate of \$1,020 for the total amount of \$2,040 in violation of the Use of Funds statute.

4. Houston Case 4

Case no.: (b) (6)

Amount: \$1,878

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston and Harris County each paid the household 1 month of financial assistance for March 2021. According to the grantees, Harris County issued the first payment for one applicant under case no. (b) (6), and Houston issued the second payment under case no. (b) (6) for another applicant in the same household. Houston is responsible for the payment due to the program's practice that the second payer will pursue reallocation or recapture. Thus, we determined that Houston provided duplicate ERA1 financial assistance for 1 month for the total amount of \$1,878 in violation of the Use of Funds statute.

5. Houston Case 5

Case no.: (b) (6)

Amount: \$1,799

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston and Harris County each paid the household 1 month of financial assistance for May 2021. According to the grantees, Harris County issued the first payment under case no. (b) (6), and Houston issued the second payment under case no. (b) (6). Houston is responsible for the payment due to the program's practice that the second payer will pursue reallocation or recapture. Thus, we determined that Houston provided duplicate ERA1 financial assistance for 1 month in the amount of \$1,799 in violation of the Use of Funds statute.

6. Houston Case 6

Case no.: (b) (6)

Amount: \$820

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston paid the household financial assistance twice for March 2021 under case no. (b) (6). Thus, we determined that Houston provided duplicate ERA1 financial assistance for 1 month in the amount of \$820 in violation of the Use of Funds statute.

7. Houston Case 7

Case no.: (b) (6)

Amount: \$810

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston paid the household twice for financial assistance for March 2021 under case numbers (b) (6) and (b) (6). Thus, we determined that

Houston provided duplicate ERA1 financial assistance for 1 month in the amount of \$810 in violation of the Use of Funds statute.

8. Houston Case 8

Case no.: (b) (6)

Amount: \$700

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston paid the household financial assistance twice for April 2021 under case no. (b) (6). Thus, we determined that Houston provided duplicate ERA1 financial assistance for 1 month in the amount of \$700 in violation of the Use of Funds statute.

9. Houston Case 9

Case no.: (b) (6)

Amount: \$600

Assistance invoice no.: (b) (6)

Use of funds violation: Duplicate assistance

Houston paid the household financial assistance twice for May 2021 under case no. (b) (6). Houston recharacterized the ineligible duplicate payment to ERA2<sup>5</sup> in April 2023 with the intent to recover the funds. However, since Houston made an ineligible payment, those funds were not eligible for recharacterization. Thus, we determined that Houston provided duplicate ERA1 financial assistance for 1 month in the amount of \$600 in violation of the Use of Funds statute.

We determined that Houston's ERA1 program paid ERA1 funds totaling \$30,981 in violation of the requirements included in the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds. Accordingly, these funds are required to be returned to the Federal Government. Table 1 below illustrates a breakdown of ineligible ERA1 payment by case number.

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<sup>5</sup> The statute authorizing ERA2 is codified at 15 U.S.C. § 9058c.

**Table 1. Ineligible Payment by Case Number**

<b>Case</b>	<b>Houston Case No.</b>	<b>Ineligible ERA1 Financial Assistance Payments</b>
1	(b) (6)	\$20,000
2	(b) (6)	2,334
3	(b) (6)	2,040
4	(b) (6)	1,878
5	(b) (6)	1,799
6	(b) (6)	820
7	(b) (6)	810
8	(b) (6)	700
9	(b) (6)	600
<b>Total</b>		<b>\$30,981</b>

Grantee Response

We provided Houston an opportunity to respond to our Proposed Notice of Recoupment. On May 5, 2025, Houston management provided a written response. See Appendix I for the response in its entirety.

Houston management concurred with the recoupment of \$9,561 (6 of 9 cases) related to duplicate payments and stated that they have initiated recapture of the funds. However, Houston management disagreed with our determination for the remaining \$21,420 (3 of 9 cases) and asserted that they are eligible costs, as summarized below.

- Houston Case 1 [REDACTED]: \$20,000

Houston management stated they verified proof of residency using the applicant’s water bill and lease addendum, which meets the proof of residency requirements. Houston management attached copies of the applicant’s water bill and lease addendum for our review.

- Houston Case 6 (b) (6): \$820

Houston management stated that, according to the program’s records, the landlord requested that the funds be allocated to another month but was unable to record the change in the system due to a technical issue.

- Houston Case 9 (b) (6) : \$600

Houston management requested further clarification on how the recharacterization constitutes a violation of the Use of Funds statute.

### OIG Evaluation

We considered Houston management's response in finalizing this notice. We commend the Houston-Harris ERA program for its efforts to minimize duplicate payments. We acknowledge Houston management's concurrence with the recoupment in the amount of \$9,561 for cases 2 to 5 and 7 to 8. We disagree with Houston management's assertion that cases 1, 6, and 9, in the total amount of \$21,420, are eligible costs, as discussed in detail below. Accordingly, Houston is required to return \$30,981 to the Federal Government.

Specifically:

- Houston Case 1 (b) (6) : \$20,000

We determined Houston did not provide sufficient evidence to demonstrate the tenant's residency or that the assistance provided was an eligible payment.

- The additional documentation (copies of water bill and lease renewal addendum) Houston management provided on May 5, 2025, are allowable documents for proof of residency; however, these documents and other documents provided for this case, when taken as a whole, raised concerns with eligibility requirements. The documents for the case included contradictory information and created an overlap in the timeline of the tenant's residency, as described below. In October 2023, we notified Houston and Harris County of overlapping assistance each had provided on behalf of different tenants at the same address. Both applications listed the same phone number and email address, but the email address contained the landlord's first and last name.
- According to the documentation Houston provided, the tenant lived at two addresses from July 2019 through December 2020.
  - The tenant's prior landlord, Landlord A, attested the tenant leased the property from July 1, 2019, through July 1, 2020, on an Applicant Rental Verification Request Form. Further, on December 4, 2020, Landlord A attested the tenant continued to lease on a month-to-month basis.

- The lease addendum shows the current landlord (Landlord B) extended the tenant's lease agreement at a different address with the same lease start date of July 1, 2019. According to the lease addendum, the agreement was extended to July 1, 2021. This address received the rental assistance and was listed in the application.
- The tenant's driver license supports the address listed for Landlord A and not the address listed on the tenant's application for Landlord B.
- The water bill is dated May 2021, which is the second-to-last-month for which the household received financial assistance and does not establish tenancy at the address for most of the timeframe Houston provided assistance (September 2020 through June 2021).

As a result, Houston did not establish that it obtained sufficient documentation that the tenant was obligated to pay rent to the address that received rental assistance in accordance with ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds. It is also unclear where the applicant lived during the period they received the rental assistance. Thus, we do not concur with Houston's position that the payment met the proof of residency requirements.

- Houston Case 6 (b) (6) : \$820

Houston management has not demonstrated that it recharacterized the funds in question to another eligible month, a requirement of Treasury recharacterization guidance.<sup>6</sup>

The additional documentation that Houston management provided on June 4, 2025, included correspondence dated April 27, 2023, and May 4, 2023, between Houston and the landlord. The correspondence instructed the landlord to reapply to reallocate the duplicated payments to different eligible months. We determined that the additional documentation provided did not (1) establish that the landlord filed a new application for assistance, on behalf of the applicant, (2) indicate that Houston had approved a new

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<sup>6</sup> Department of the Treasury, "Emergency Rental Assistance Frequently Asked Questions" (December 4, 2024), <https://home.treasury.gov/system/files/136/ERA-FAQs-12042024.pdf> (accessed July 10, 2025). Per Frequently Asked Question 45, the grantee may decline to recover its payment and instead recharacterize it as assistance covering a different period of eligible rental or utility expenses, if the grantee documents, in accordance with ERA records requirements, which expenses its funds ultimately covered; and the grantee confirms that the household was eligible for all assistance it received, including ensuring that the total number of months of financial assistance received by the household does not exceed statutory limits, as described in FAQ 10.

application, and (3) show the eligible month to which the duplicate payment credit should be reallocated.

Further, Houston identified the amount associated with the case as a “refund requested” item, which means the amount is subject for recapture by Houston.

Thus, we do not concur with Houston’s position that the payment was eligible.

- Houston Case 9 (b) (6) : \$600

Houston provided two Federally funded rental assistance payments to the same household for May 2021, thus, its recharacterization of an ineligible payment to ERA2 was in violation of use of funds requirements. Specifically, 15 U.S.C. 9058a(k)(3)(B), which requires that, “an eligible grantee shall ensure that any rental assistance provided to an eligible household pursuant to funds made available under this section is not duplicative of any other Federally funded rental assistance provided to such household.”

According to Treasury management, by using both ERA1 and ERA2 award funds to cover assistance payments to the same household for the same rental period, Houston is in violation of the ERA1 statutory requirement outlined at 15 U.S.C. 9058a(k)(3)(B). Thus, recharacterizing the duplicative ERA1 rental assistance paid to the household to its ERA2 award – regardless of the intent to recover the duplicative payment – is not allowable. To resolve this noncompliance, Houston would need to identify different months within the allowable 18-month assistance limitation period and the ERA1 award period of performance for which ERA assistance or other federally funded rental assistance had not already covered for the household to recharacterize the ineligible payments as an eligible ERA2 expenditure. If the household already received a cumulative total of 18 months of ERA financial assistance from Houston and/or other ERA grantees that was not covered by any other federally funded rental assistance, the ineligible payments would have to be returned out of Houston’s own funds to the Federal Government.

As noted in our prior desk review report (see footnote 2), we coordinated with Houston and determined the duplicate payment was not eligible for ERA2 recharacterization.

We appreciate the courtesy and assistance provided by your staff. Should you have any questions, please contact Julie Wong, Acting Deputy Assistant Inspector General for Audit, at (202) 439-6354 or John Tomasetti, Audit Director, at (202) 277-3210.

Grantee Response

DocuSign Envelope ID: (b) (6)



**CITY OF HOUSTON**  
Housing & Community Development Department

**John Whitmire**  
Mayor

Michael C. Nichols  
Director  
2100 Travis, 9<sup>th</sup> Floor  
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May 5, 2025

John Tomasetti, Housing Assistance Audit Director  
Department of the Treasury | Office of Inspector General  
875 15<sup>th</sup> Street NW, Washington, DC 20005

Re: Emergency Rental Assistance Proposed Recoupment Response – ERA0038

Dear Mr. Tomasetti:

The City of Houston ("City") acknowledges receipt of the Draft Notice of Proposed OIG Recoupment letter dated April 22, 2025. The City appreciates the opportunity to review and respond to the proposed recoupment resulting from the Department of the Treasury Office of Inspector General's ("OIG") desk review of the Houston - Harris County Rental Assistance Program ("Program").

Below, the City has provided a response indicating concurrence or non-concurrence for each of the identified cases, along with the actions taken since the initial inquiry. Additionally, the accompanying supporting documentation substantiates the City's basis for any cases of non-concurrence.

**Summary:** The OIG has determined that the City issued financial assistance totaling \$30,981.00 in violation of the ERA1 statute 15 U.S.C. §9058a(c), Use of Funds.

**City's Response:** The City concurs with the recoupment of \$9,561.00 associated with six (6) of the identified cases due to duplicate payments. However, based on the City's review, the remaining \$21,420.00 of the proposed recoupment – related to three (3) cases - are eligible costs.

1. Houston Case 1

Case number (no.): (b) (6)

Amount: \$20,000.00

Assistance invoice numbers: (b) (6)

(b) (6)

Use of funds violation: Ineligible payment

The City does not agree with the OIG's determination. The program confirmed that proof of residency was verified using the applicant's water bill and lease addendum

Council Members: Amy Peck Tarsha Jackson Abbie Karns Carolyn Evans-Shabazz Fred Flickinger Tiffany D. Thomas Mary Nan Huffman Mario Castillo  
Joaquin Martinez Edward Pollard Martha Castex-Tatum Julian Ramirez Willie R. Davis Twila Carter Letitia Plummer Sallie Alcorn  
Controller: Chris Hollins

## Grantee Response

DocuSign Envelope ID: (b) (6)

which meets the proof of residency requirements. Copies of the water bill and lease addendum are attached for the Treasury's review.

2. Houston Case 2  
Case number (no.): (b) (6)  
Amount: \$2,334.00  
Assistance invoice numbers: (b) (6)  
Use of funds violation: Ineligible payment

The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on May 25, 2023.

3. Houston Case 3  
Case number (no.): (b) (6)  
Amount: \$2,040.00  
Assistance invoice numbers: (b) (6)  
Use of funds violation: Ineligible payment

The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on May 25, 2023.

4. Houston Case 4  
Case number (no.): [REDACTED]  
Amount: \$1,878.00  
Assistance invoice numbers: [REDACTED]  
Use of funds violation: Ineligible payment

The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on June 21, 2023.

5. Houston Case 5  
Case number (no.): [REDACTED]  
Amount: \$1,799.00  
Assistance invoice numbers: [REDACTED]  
Use of funds violation: Ineligible payment

The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on April 26, 2023.

6. Houston Case 6  
Case number (no.): [REDACTED]  
Amount: \$820  
Assistance invoice numbers: [REDACTED]  
Use of funds violation: Ineligible payment

The City does not agree with the OIG's determination. According to the Program's records, the landlord requested that the funds be allocated to another month but was unable to record the change in the system due to a technical issue. The file contains correspondence documenting the reallocation request.

7. Houston Case 7  
Case number (no.): (b) (6)

## Grantee Response

DocuSign Envelope ID: (b) (6)

Amount: \$810  
 Assistance invoice numbers: (b) (6)  
 Use of funds violation: Ineligible payment

The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on June 23, 2023.

8. Houston Case 8  
 Case number (no.): [REDACTED]  
 Amount: \$700  
 Assistance invoice numbers: (b) (6)  
 Use of funds violation: Ineligible payment

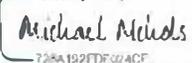
The City agrees with OIG's determination of duplicate payment. The Program initiated recoupment on April 21, 2023.

9. Houston Case 9  
 Case number (no.): [REDACTED]  
 Amount: \$600  
 Assistance invoice numbers: [REDACTED]  
 Use of funds violation: Ineligible payment

The City does not agree with the OIG's determination and respectfully requests further clarification on how the recharacterization constitutes a violation of the Use of Funds statute.

If you have any additional questions please contact Kennisha London, Compliance and Grant Administration Division Deputy Director, [Kennisha.London@houstontx.gov](mailto:Kennisha.London@houstontx.gov) or (832) 394-6197.

Very truly yours,

DocuSigned by:  
  
 728A192FDF004CF  
 Michael C. Nichols, Director

## OIG NOTE:

The attachments referenced in the Grantee Response are not included in this Appendix due to the inclusion of sensitive personal information. To maintain transparency and completeness of the record, the attachments are summarized in the "Grantee Response" section, beginning on page 7 of the Notice of Recoupment. Where applicable, OIG's evaluation of the referenced materials is provided.