

## Des Moines Municipal Housing Agency (DMMHA) Fraud Policy

### Introduction

The City of Des Moines, Municipal Housing Agency (DMMHA) is committed to protecting the integrity of the housing programs that are administered by the DMMHA and ensuring that benefits are received only by eligible families and participating owners in accordance with federal regulations.

The purpose of this policy is to prohibit dishonest acts and/or fraudulent activity and to advise employees, managers/administrators and tenants that they are responsible for preventing, identifying, and reporting fraud. This policy also includes all DMMHA vendors, customers and partners to the extent that any DMMHA resources are involved or impacted. If you have reason to believe that any fraudulent activity is taking place in connection with any of the DMMHA's housing programs, we ask that you promptly bring the matter to the DMMHA Director or his or her designee.

### Policy Scope

Fraud is defined as an intentional deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. Some examples of fraud include but are not limited to:

- False statements from tenants or employees
- Tenant misrepresentation of income
- Subletting a subsidized apartment/home
- Bribery or kickbacks
- Falsification of expenses and invoices
- Failure to account for monies collected
- Theft of cash or fixed assets
- Theft or embezzlement
- Forgery or alteration of documents
- Destruction or concealment of records
- Profiting from insider knowledge or a conflict of interest
- Authorizing or receiving payments for goods not received or services not performed
- Authorizing or receiving payment for hours not worked
- Any apparent violation of Federal, State, or local laws related to dishonest activities or fraud
- Any similar or related activity

Examples of owner fraud may include but is not limited to:

- Offering bribes to DMMHA employees
- Accepting housing assistance payment for properties that one does not own or represent as the legal agent
- Accepting housing assistance payments for vacant apartments/homes
- Requesting rent payments from tenants in excess of the amount stated in the lease
- Renting to relatives without prior approval from the DMMHA

### Confidentiality Statement

All investigations will be conducted in confidence insofar as reasonably possible. The name or names of those communicating information about a fraudulent act and the name or names of those suspected of a fraudulent act will only be revealed when required by law in conjunction with the investigation or legal action.

### Authorization for Investigation

The DMMHA Department Director, Assistant Director, or a designated DMMHA Supervisor is responsible for the investigations which may include obtaining and examining any related records.

## **Consequences**

Appropriate and timely action will be taken against those proven to have committed a fraudulent act. These remedial actions may include, but are not limited to:

- Disciplinary action (up to and including immediate termination of employment).
- Restitution for all losses, including investigation and legal expenses, to the fullest extent of the law.
- Forwarding information to the appropriate authorities for criminal prosecution.
- Institution of civil action to recover losses.
- Where the DMMHA elects to take corrective or disciplinary action, it will proceed under the procedures in place under policy or under any collective bargaining agreement for the respective employment classification.
- The DMMHA may take corrective or disciplinary action without awaiting the resolution of criminal or civil proceedings arising from the fraudulent conduct.
- The DMMHA Director or his or her designee will contact the HUD Office of Inspector General (OIG) office.

## **Due Process**

The DMMHA Director or his or her designee will review all recommendations for: evictions, termination of assistance, cancellations of contracts with vendors and/or contractors, and the termination of an employee and all will be accorded full due process of the law.

## **Fraud Reporting Requirements**

Suspected fraud or related criminal activities can be reported to:

Des Moines Municipal Housing Agency (DMMHA)  
Attn: Director or his or her designee  
100 E. Euclid Suite 101  
Des Moines, IA 50313-4534  
Phone: (515) 323-8950  
Fax: (515) 242-2844