



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000
OFFICE OF PUBLIC AND INDIAN HOUSING

June 18, 2012

MEMORANDUM FOR: Edward L Moses, Regional Public Housing Director

FROM: Barbara Gallegos, PHARS Team Leader

SUBJECT: City of Richmond Housing Authority (CA010)
PHARS Internal Summary of Assessment

PHA Name: City of Richmond Housing Authority

PHA Code: CA010

PHAS Designation: Troubled

Designation Year: 2011

PHAS Score:

PHAS	FASS	PASS	MASS	RASS
53	30	0	16	7

Date Final Score Released: 1/21/2011

FYE: 06/30

Number of Public Housing Units: 679

Number of Section 8 Vouchers: 1750

SEMAP Troubled? Yes

Reason for Assessment: PHAS Status

Date Remote Assessment Initiated: 11/23/2011

Remote Assessment conducted by:

Team Leader: Barbara Gallegos
DEC: Marc Vigo
FO: Melina Whitehead
Myra Smith
Nicholas White
Other: C Raphael Mecham
Pete Koziol
Claire Garcia
Myra Smith

Melina Whitehead
Nicholas White

Final Date Onsite: 2/27/2012 - 3/1/2012
Onsite Assessment Conducted By:

Team Leader: Barbara Gallegos
DEC: Marc Vigo
FO: Melina Whitehead
Myra Smith
Nicholas White
Other: C Raphael Mecham
Pete Koziol
Claire Garcia
Myra Smith
Melina Whitehead
Nicholas White

PHA Background Information

General PHA Background:

- The Richmond Housing Authority (CA010), manages 679 public housing units in seven developments, and administers 1750 vouchers. The authority has a lengthy history of poor management. Many of the deficiencies identified in an Independent Assessment issued by Mitchell and Titus, LLP in August 2005 are still deficiencies in the Independent Assessment report issued by the Nelrod Company in September 2011. Audits have not been submitted to REAC since 2008, and although the audits for 2008 through 2010 were completed, none of the audit findings have been addressed by the housing authority to date. As a result of their failure to submit their audits to REAC, they have been PHAS Troubled since 2009. The current Executive Director has been there approximately 6 years, but few improvements have been made. The financial condition of the authority has gotten worse by the year, and, based on the audit findings from as far back as 2009, both Independent Assessments mentioned above, and the review conducted by the PHARS Team, the total lack of internal controls has contributed significantly to the authority's current condition. The authority was SEMAP Troubled until May 2012 when they finally resolved CAP deficiencies. The RHA Executive Director has not been consistently responsive or cooperative with the Field Office. RHA salaries and benefits are high, due to the management/union agreement, and large annual increases for the Executive Director. The RHA Executive Director reports to the City Manager.

PHA and Board Structure:

- The City of Richmond Housing Authority is governed by seven elected City Council members and two Resident Board Members. In addition, there is a Housing Advisory Commission comprised of a Council liaison, 2 resident commissioners and 5 other members appointed by the Mayor. The Commission conducts monthly meetings and are provided with financial and administrative reports. The Commission does not appear to have sufficient housing knowledge and, based upon the minutes, the Executive Director does not provide the Commission with appropriate information regarding the condition of the housing authority. The City Manager has direct supervisory oversight over the Executive Director, and, based on interviews, appears to be misled by the Executive Director regarding the condition of the housing authority. A cooperation agreement was not provided and, according to the Executive Director, might be "in the archives". Declarations of Trust for PHA properties could also not be located.

Open IPA Audit Findings:

- All IPA audit findings from 2008-2010 audits remain open.

Incomplete SEMAP CAP Items:

- All CAP items were resolved in May 2012.

Open Field Office Review Findings:

- None

Open ARRA Deficiencies:

- All ARRA deficiencies were corrected prior to the onsite PHARS review.

Assessment Summary

Onsite Objectives met:

Additional Narrative

- **GOVERNANCE:** General oversight of RHA is delegated by the City Council (Board of Commissioners) to the City Manager, who directly supervises the RHA Executive Director. Minutes of the Advisory Commission, who meets with the Executive Director monthly, were provided to the PHARS Team. A review of the minutes reveals that although the members have some housing knowledge, they need additional training so that they can ask the correct questions. The Board of Commissioners (City Council) leaves the routine housing matters to the Advisory Committee. Interviews with the City Manager revealed that he/the City was unaware of the scope of the RHA deficiencies. Other issues regarding poor governance are referred to in other parts of this assessment regarding the debt owed to the City by RHA, the lack of a Cooperation Agreement between the City/RHA, and the lack of a realistic cost allocation plan approved by HUD. Cost allocations appear to have been charged to the RHA without consideration of ability to pay, duplicative services, and eligibility of charges. **LACK OF ADMINISTRATIVE CAPACITY OF KEY MANAGEMENT STAFF:** Throughout the remote and PHARS Team onsite visits in December 2011 and January 2010, there was an extreme lack of cooperation by RHA management staff. Documents requested were either not provided, wrong documents provided, or the RHA staff appeared to purposely delay providing the documents. The PHARS Team met with the IPA auditor, who made similar comments regarding the provision of documents needed to complete the audit. Requests and emails to the RHA from the Field Office were ignored. The Executive Director did not provide oversight on Finance transactions and the review team was often provided conflicting responses from him. Review of the Advisory Commission minutes revealed that he did not appear to provide key information to the Commission regarding the status of the housing authority. He did not appear to take an active role in proper oversight and management of the agency. Employees interviewed did not have a clear understanding of their roles and responsibilities. When asked who was responsible for emergency maintenance calls, the Team was provided conflicting responses. Overall management of staff is poor and staff who do not perform adequately are not disciplined or the issues are not addressed by management. Internal controls are poor or absent. Lack of internal controls was one of the OIG audit findings, and although the finding was closed because the recommended actions were completed, in practice, the RHA continues to lack internal controls. Bank signature cards initially could not be located and when finally provided, it was discovered that one of the cards still authorized the retired Deputy Director access to the account. In addition, the credit card assigned to the retired Deputy Director was also still active. Credit cards were issued in the employee's names instead of the RHA. **STAFFING ISSUES:** Salaries and Expenses compose the majority of the Operating Expenses. Salary increases are aggressive for some staff. The Executive Director received a 31% increase over the past three years; however, the RHA is unable to meet payroll from operating cash flow. **FINANCIAL REPORTING:** The RHA has failed to meet HUD's financial reporting requirements for fiscal years 2008, 2009, 2010, and 2011. The last year that they were in compliance was fiscal year 2007. The reason RHA gave for this was that they were unable to convert their accounting records to HUD's Asset Management format for Public Housing. The RHA hired a consultant to convert the financial statements to asset management format for 2010 and 2011 and they were able to submit unaudited financial statements for FY 2010 and FY 2011 to REAC. The inability of the RHA to comply with HUD's financial requirements is a "red flag" that they do not have the ability or expertise necessary to produce

- FINANCIAL REPORTING:** The RHA has failed to meet HUD's financial reporting requirements for fiscal years 2008, 2009, 2010, and 2011. The last year that they were in compliance was fiscal year 2007. The reason RHA gave for this was that they were unable to convert their accounting records to HUD's Asset Management format for Public Housing. The RHA hired a consultant to convert the financial statements to asset management format for 2010 and 2011 and they were able to submit unaudited financial statements for FY 2010 and FY 2011 to REAC. The inability of the RHA to comply with HUD's financial requirements is a "red flag" that they do not have the ability or expertise necessary to produce financial records that are in compliance with GAAP and HUD. In order to comply with HUD's financial reporting requirements for 2008-2011, the old software system may have to be relied on to provide additional records and reports. During the onsite review, RHA staff was unable to produce effective and readable financial reports from this system. It has been difficult to verify the reliability of their financial records. The RHA changed their accounting software systems effective July 1, 2011, however, as of February, 2012, they had not converted balance sheet accounts to the new software system. Apparently, RHA staff is having problems converting the records from the old system to the new.
- FINANCE POLICIES:** The Nelrod Report issued in September 2011 stated that the RHA provided only a few financial-related policies and did not know if any of the policies were approved by the Board. Policies and procedures were significantly commingled with the City. There are deficiencies in written procedures throughout the RHA and policies need to be revised and updated. The RHA did not have policies/procedures for Internal Controls, Investments, Fraud Prevention and Detection, Record Retention, Collections/Charge-Offs, and Credit Card Use. The RHA stated there was a Check Writing Policy but did not provide it to Nelrod. The PHARS Team received copies of the following finance related policies during the review: Tenant Accounting (Rent Collections), Section 8 Receivables and Collections, Accounts Payable/Disbursement Procedures, Fixed Assets, Payroll, Materials and Equipment, Section 8 Check Transmittal and Stop-Payment Procedures, Notice of Levy or Garnishment, Petty Cash, Check Return/Placement, Journal Vouchers, and Annual Physical Inventory. The PHARS Team found that written policies conflicted with actual practice, as follows: General ledger entries made by the Finance Manager were not reviewed/signed off by a second individual; the RHA is sometimes using old rent collections to pay non-program expenses and charging these expenses to a "local fund"; the RHA is not utilizing purchase orders for the accounts payable process; there is no credit card policy.

- **FINANCIAL RELATIONSHIP WITH THE CITY OF RICHMOND:** The RHA is a component unit of the City. The financial viability of the RHA is closely related to its financial relationship with the City. The City bills the RHA for many services beyond the means of the RHA to pay. The debt owed by RHA to the City in FYE 2005 was \$2,888,539; at FYE 2006, it was \$3,592,963; at FYE 2007, it was 5,090,029; at FYE 2008, it was \$5,343,771; at FYE 2009, it was \$5,408,830; at FYE 2010, it was \$5,105,079, and FYE 2011, it was \$6,842,227, and it is estimated the debt will be approximately \$10 million by the end of FYE 2012. **COST ALLOCATION CHARGES FROM CITY:** A review of invoices indicate that the City is charging RHA approximately \$50,000 per month for allocated costs. The costs appear higher than necessary. There is no indication that RHA has objected to the charges or is seeking these services from alternate sources at lower rates. The RHA has 6-8 employees that work out of the City building; however, the RHA has adequate space at their Nevin housing office/projects to house those employees. Payroll services could be solicited and be provided from a payroll vendor at competitive prices. It is not in RHA's best interest to incur charges of \$50,000 for allocated costs from the City. In addition, a cost allocation plan has never been submitted to the FO for approval, as required by OMB Circular A-87. **POOR OVERSIGHT BY CITY OF RICHMOND:** For at least six years, the City has charged the RHA RHA for expenses it cannot afford. Although there is a repayment agreement between the City and RHA, the overall deficit to the City has continued to grow. The City has failed to demand that the RHA operate within a balanced budget. In advancing funds to RHA, the City should determine if the RHA has the ability to pay back funds. This is important in determining how to treat the advance in financial records. Based on past experience, it appears the RHA does not have the ability to repay the City. Housing agencies are normally not income-generating entities. When they sustain operating deficits, it is difficult to recover the loss. Once it is recognized that the RHA is unable to repay the loan, this affects how the advances are treated on financial statements. Based on the inability of RHA to repay, the City, in continuing to advance funds, is in fact providing financial support (in form of, say, a grant) to help fund RHA's operations. In this case, the advanced funds would be considered as an owner contribution, not a receivable to the City; and revenue to the RHA; not a liability. It is recommended that those responsible for audit financial statements of the City and RHA be made aware of RHA's inability to repay the advances so that these transactions can properly be evaluated and corrected in compliance with governing accounting principles, if necessary.

- **OPERATING PERFORMANCE FOR PUBLIC HOUSING PROGRAM:** A review of the financial statements available for the public housing program for the past five years shows that the RHA incurred operating deficits in FY's 2007 thru 2009, totaling \$2,297,000 for the 3-year period. In FY 2010, the RHA appeared to break-even. Their debt to the City was reduced by \$303,000, which was a favorable indicator; however, these repayments represent regularly scheduled payments to the City under the 2007 MOA. A review of the repayments under the 2007 MOA reflect a sporadic payment history with consecutive months of non-payment followed by a large lump sum payment to the City as cash flow permits. Financial records are not clear regarding their performance in 2011; however, the increase in debt to the City was \$1,737,148, which would indicate a large operating deficit for the year. **FINANCIAL RECORDS OF RHA:** The financial software used by RHA, Emphasys, is antiquated and ineffective. The RHA staff was unable to provide readable, usable reports off the General Ledger to allow for a timely and effective audit. The General Ledger was only available in text format. The PHARS Team asked the independent auditor to provide us with the General Ledger reports they used in auditing the RHA. The City does not use the same software as RHA. At review time, the RHA was in the process of converting to a new software provider, Yardi, for FY2012. Until readable reports can be provided off the RHA's General Ledger, the PHARS Team is unable to verify the validity of the financial records provided by RHA, without committing additional extensive resources to auditing their records under current conditions. **RHA AVAILABLE CASH:** The Public Housing program for RHA has very limited available and unencumbered cash assets (working capital). The ""unrestricted net assets"" listed for public housing on the FY 2011 unaudited Financial Data Schedule was \$4,672,820. Program-wide, there is very little unencumbered cash available.

- **RHA INELIGIBLE EXPENSES:** The PHARS Team reviewed RHA's check register and credit card statements for the past three years to determine compliance with OMB Circular A-87 (allowable and reasonable expenses) and compliance with the Authority's internal controls. The review found that RHA lacks sufficient internal controls to properly monitor its employees' adherence to any internal policies and OMB Circular A-87, resulting in numerous violations in terms of expense allowableness and reasonableness. The RHA issued business credit cards to the Executive Director (Tim Jones), the Deputy Director (Manny Rosario, who retired in November, 2011, after he was issued an LDP), and the Finance Manager (Anthony Taplin). Examples of unallowable and unreasonable expenses include: Personal Expenses related to Auto Repair, gasoline, non-business related meals and auto rental by the Finance Manager. Mr. Taplin reimbursed the RHA approximately \$5,900 for all but the gasoline and non-business related meals. Excessive amount of meal charges by Mr. Jones to the credit card for business lunches and dinners. Mr. Jones heavily favors Salute E. Vita restaurant in Richmond, charging \$125.92, \$73.44, and \$194.91 for meals in a three-week period. Over the three-year period reviewed, there were 23 charges to this restaurant, averaging approximately \$80 per meal. The City's travel policy specifically states that ""Restaurant business meals solely between City employees are not reimbursable."" Many of the receipts indicated ""Staff or PH meeting"". Other restaurant charges by Mr. Jones include meals paid for by the RHA for meetings with CHDC (part of Neighborworks), Nelrod (an independent organization that conducted the Independent Assessment referenced elsewhere in this report), and Asher and Associates, who completed RHA's RDS. It is unclear why Mr. Jones would pay for meals for these organizations who are seeking to contract with RHA for financial gain. The former Deputy Director, Manny Rosario, sent numerous floral arrangements to RHA staff that suffered a family member loss and charged those to RHA. Costs for social events or for purchase of items to express condolences for death, birthdays, etc., are not reimbursable, according to the City's policy, nor are eligible under OMB Circular A-87. Mr. Jones traveled to Montreal, Canada and charged \$130 for personal gifts he bestowed upon the RHA Board members upon his return. Mr. Jones did not reimburse the RHA for the cost. During the period reviewed, the RHA was charged several late fees on its credit cards. Several instances were noted when the minimum payments were not made, resulting in a late payment fee. Late payment fees are not permitted under A-87. The RHA generally caters its Board of Commissioners meetings and Housing Advisory Commission meetings. An example is a \$2,142.45 charge to Edible Café' and Catering on July 17, 2008, for a RHA meeting. The RHA catered Mr. Rosario's ""retirement"" party and charged all food to the RHA credit card. The City's policies prohibit use of funds for these type of events, and these costs are ineligible under A-87. The RHA provided a \$200 donation to the City Police Department, which is ineligible under A-87. Mr. Jones charges several large restaurant purchases while on travel, including a \$417.34 charge at Fabio Piccolo Fiori in New York City and two purchases at Georgia Brown's restaurant in Washington, DC for \$130.60 and \$279.90. Mr. Jones approves his own credit card charges for payment by the Finance Manager. All these examples speak to a lack of internal controls and non-compliance with City Policies and OMB requirements.

- **TRAVEL EXPENSES:** The RHA provided the PHARS Team with information on all travel by RHA staff and its Board and Advisory Commission for the past three years. The RHA utilizes the City's Travel Policies dated August 25, 99. Based on a review of documentation provided, it appears RHA is not adhering to those travel policies in regards to per diem compensation to its Executive Director and advance approval of all travel. It was unclear who actually approves travel requests in advance of an employee traveling. While post-travel expense reimbursements are approved by the Executive Director via his signature on the payment request form, the RHA does not appear to follow any system to request approval for travel that would detail the estimated cost of each trip, e.g., airfare, hotel, per diem, etc. Such a system would allow RHA to properly monitor its actual travel expenses to its budget and monitor an employee's actual expenses to those projected prior to traveling. This situation again speaks to lack of internal controls. The travel spreadsheet provided by RHA is inaccurate and conflicts with actual charges to employee credit card statements, particularly related to Mr. Jones, e.g., hotel and airfare charges reflected on travel spreadsheet exceed amounts actually charged to Mr. Jones credit card. At the time of the review, only two credit cards remain. All travel expenses for any RHA employee and/or Board of Commissioners is charged to either the credit cards assigned to Mr. Jones or Mr. Taplin. Credit cards are in the employee name. Mr. Jones appears to have been paid per diem stipends of \$40 per day while on travel while charging meals to his RHA credit cards.
- **INVENTORY OF PHYSICAL ASSETS:** The PHARS Team requested the RHA's most current inventory for all physical assets. The Team was initially provided an inventory reconciliation report as of June 30, 2011; however, this report reflected only maintenance materials located primarily in the RHA warehouse. When questioned about the inventory of other physical assets, the Team was advised that they did not maintain any records for equipment or furniture but was assured that all such items were accounted for. Subsequent to its onsite review, RHA provided the Team a "List of Physical Assets" dated March 22, 2012, which supposedly reflected all assets of the RHA, including those not included on the original report. However, the Team doubts this report accurately portrays the RHA's actual physical assets since the list includes numerous desk top computers and laptops purchased in 1998, several printers purchased in 1997-1998, and many ovens purchased in 1985. **CONVERSION TO ASSET MANAGEMENT:** The RHA has yet to properly convert to asset management and will require assistance and oversight to ensure proper implementation.

- **POOR RECORD KEEPING:** There was poor record keeping throughout areas of the review. Examples include: Procurement documents were incomplete or missing from files; support documents for travel, credit card use, and salary increases were incomplete or missing or not provided; RHA staff was unable to locate and provide a Cooperation Agreement with the City or Deeds of Trust for RHA properties; Financial documents requested and provided were either incomplete, outdated, and many documents could not be located by RHA staff during the review; and the IPA auditor informed the PHARS Team that the RHA's poor record keeping contributed to the length of time needed to complete a draft and a final audit. **PROCUREMENT:** The RHA Procurement Policy provided to the Team was generally compliant with Part 85 and HUD requirements but was dated 1997. The RHA had previously provided a Procurement Policy to the FO that had been updated twice since 1997, most recently in 2010. This disparity in documents provided by RHA staff, and documents submitted to the FO for review indicates a significant procurement weakness. The Policy dated 2010 does not mention the requirement for a Section 3 Contract Clause or address micropurchases; however, it is noted that the Policy does reference Handbook 7460.8, Rev 2, by reference. The Policy makes repeated references to outdated CIAP/CGP programs. Other procurement concerns identified include: Procurement records were reviewed for procurements under \$100,000. Records were poor and procurement was inconsistent. The Executive Director states he was now the Procurement Officer, but despite attending procurement training required as a result of an OIG audit, he lacks procurement knowledge required to comply with requirements, and appears to disregard many requirements. Records provided by RHA staff are incomplete, and do not clearly correlate with what has been submitted to the FO for review. Staff claim that repeated HUD reviews have damaged the integrity of their files. It should be noted that RHA is required to submit procurements over \$100,000 to the FO for review, and those procurements appear to comply with Part 85. It appears that procurements under \$100,000 (those reviewed by the PHARS Team) do not receive the same level of attention to compliance. Other procurement concerns identified include: No delegations of authority for Contracting Officer during absences; no Procurement Procedures defining individual roles/responsibilities; purchases of up to \$2,500 are authorized without soliciting competitive quotes in violation of HUD's Micro-threshold of \$2,000; during interviews with the Executive Director (Procurement Officer), it was apparent he was not totally engaged in process and appeared ignorant of many basic procurement requirements; some staff involved in procurement appear engaged in following "correct" procedures but there was no evidence of a unified direction in procurement throughout the RHA.

- **HOPE VI SITE ACQUISITION:** The PHARS Team was asked to include a review of the HOPE VI site acquisition of a small property adjacent to Nevin Plaza. The following comments regarding this review are provided: RHA was awarded a HOPE VI (CA39URD0101100) grant in June of 2001. Budget line item 1440 in the amount of \$1,016,200 was for the purchase of 3.2 acres from the City of Richmond for construction of a third rental phase. Subsequently, the City withdrew the offer of sale to the RHA. On April 8, 2009, the RHA submitted an Environmental Review and an RROF to the FO. On May 4, 2009, the RHA proceeded to purchase a property at 319 25th Street for placement of a "clinic" to serve residents of Nevin Plaza, in lieu of the original 3.2 acres. The funding for the purchase was derived from "Loan Repayment Proceeds" - Program Income, from a homeownership phase of the HOPE VI development. Use of Program Income is regulated by CFR Part 85.20(b). On May 19, 2009, HUD responded to the RHA informing them that the purchase of the property was denied due to insufficient information. On May 20, 2009, HUD approved the RROF. Approval of the RROF did not constitute an approval of the property purchase, only an approval of the environmental review. As late as January 2012, HUD had still not received a response from RHA regarding HUD's letter of May 19, and had not provided approval to purchase the property. Discussions between HQ HOPE VI staff, FO, and PHARS Team resulted in a consensus that the acquisition of the property was in violation of program income and HOPE VI requirements. The FO has issued a letter to that effect.

Results and Determinations

Finance

- Lack of internal controls and oversight has resulted in ineligible expenses, poor recordkeeping, failure to comply with HUD's accounting and reporting requirements.

Finance

- Procurement records are poor and procurements are inconsistent
- Board of Commissioners (City Council) or Housing Advisory Commission do not have sufficient knowledge of Housing Authority operations, programs, financial condition, or activities, and as a result, cannot provide proper oversight of Executive Director

Governance

- Executive Director is ineffective in managing the RHA's programs with respect to performance and regulatory compliance.

Governance

- The City's oversight has been ineffective.

Governance

- Expenses exceed income, whereby the City has provided a "loan" to RHA which it will be unable to pay, causing additional financial problems.

Finance

- The Finance Manager's knowledge is inadequate, records are poor

Finance

- Failure to comply with HUD's accounting/financial reporting requirements

Remedies and Resources

Root Cause: Ability	
Potential Intervention:	Hire Management Company to run housing authority for at least three years.
Unintended Consequences	Resistance from City Council/Board
Necessary Resources	
Required Partners	City of Richmond/Board of Commissioners, FPM, OFO, FO

Root Cause: Readiness and Ability	
Potential Intervention:	Limited Denial of Participation of Board of Commissioners
Unintended Consequences	Political opposition, media attention
Necessary Resources	Would require new Board to be appointed by Mayor
Required Partners	FPM, OFO, DEC, Regional Counsel, RPC

Root Cause: Readiness and Willingness	
Potential Intervention:	Hire Management Company to run housing authority
Unintended Consequences	Resistance from City Council/Board
Necessary Resources	Funding from PHA to pay for Management Company
Required Partners	FPM/OFO/FO

Root Cause: Readiness and Willingness	
Potential Intervention:	LDP the Board of Commissioners (City Council)
Unintended Consequences	Resistance from City/Mayor, media attention
Necessary Resources	
Required Partners	FPM/OFO/Regional Counsel/DEC/RPM

Root Cause: Readiness, Willingness, Ability and Ethics	
Potential Intervention:	Limited Denial of Participation (LDP) Executive Director
Unintended Consequences	Resistance from City/Board
Necessary Resources	
Required Partners	FPM/DEC/Regional Counsel/OFO/FO

Root Cause: Readiness, Willingness, Ability and Ethics	
Potential Intervention:	Limited Denial of Participation (LDP) Finance Manager
Unintended Consequences	Resistance from City/Board
Necessary Resources	
Required Partners	FPM/DEC/OFO/FO/Regional Counsel

Root Cause: Readiness, Willingness, Ability and Ethics	
Potential Intervention:	Hire Management Company to run housing authority
Unintended Consequences	Resistance from City/Board and Mayor
Necessary Resources	Housing funds to pay for management company
Required Partners	FPM/OFO/FO

Root Cause: Readiness, Willingness, and Ability	
Potential Intervention:	Limited Denial of Participation of Executive Director
Unintended Consequences	Resistance by City/Board
Necessary Resources	
Required Partners	FPM/DEC/RPM/Regional Counsel/OFO/FO

