

# SIGTARP

SEMIANNUAL REPORT TO CONGRESS  
OCTOBER 1, 2022 - MARCH 31, 2023



# LETTER FROM THE PRINCIPAL DEPUTY SPECIAL INSPECTOR GENERAL

## **SIGTARP's Semiannual Report (October 1, 2022 - March 31, 2023)**

Ever since Congress created the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) under the Emergency Economic Stabilization Act (EESA), we have consistently delivered for American taxpayers. As an independent watchdog, SIGTARP has a proven record of identifying waste, abuse, ineffectiveness, inefficiency, and risk in EESA programs.

As a law enforcement office, SIGTARP has a proven record of identifying and investigating fraud and other crimes. SIGTARP investigations have resulted in the recovery of more than \$11.3 billion while coordinating with the Department of Justice (DOJ) and other law enforcement agencies to criminally prosecute 471 defendants - 321 of them sentenced to prison, including 75 bankers. Our investigations have also resulted in enforcement actions against 25 corporations/entities, including enforcement actions against many of the largest U.S. financial institutions.

We continue to support DOJ on prosecutions related to bankers and co-conspirators investigated by SIGTARP. During this reporting period, SIGTARP investigations led to new charges, convictions, and sentencing. For example, a co-conspirator was sentenced to one year of supervised release and ordered to forfeit almost \$3.7 million for his role in a bribery scheme with the former CEO of a bank.

The Home Affordable Modification Program (HAMP) is the largest ongoing EESA program and is ending on April 28, 2023. According to March 2023 data, HAMP is still providing much needed foreclosure relief to more than 550,000 participating homeowners living in all 50 states. The Department of the Treasury (Treasury) paid \$122.9 million in fiscal year 2023 and made its final advance payment of eligible incentives in March 2023. SIGTARP's investigations into the HAMP program have protected consumers seeking access to HAMP and who subsequently became the victims of scams. To date, SIGTARP has brought to justice 121 convicted scammers.

The fact that an EESA program closes, or the defendant is no longer taking part in the program while SIGTARP's investigation is pending, will not stop SIGTARP or prosecutors (such as the DOJ and state Attorneys General) from bringing justice and accountability to individuals or entities that violated the laws and could do so again. The time frame of our work is not tied to the time frame of Treasury or other entities administering funds in these programs. For example, while the Hardest Hit Fund closed in December 2021, SIGTARP investigations led to a \$1.5 million civil settlement with the Detroit Land Bank Authority for claims related to unsubstantiated backfill costs in connection with the Blight Elimination Program.

As investigations and audits are focused on past actions, ongoing activity in these programs adds to our future work. It is imperative that SIGTARP fulfills its mission to independently ensure that these programs were effective, and to bring accountability for fraud, waste, and abuse.

Respectfully,

**MELISSA BRUCE**

Principal Deputy Special Inspector General

Performing the Duties of the Special Inspector General

## MISSION

Prevent and detect fraud, waste, and abuse in the more than \$442 billion appropriated by Congress through the Emergency Economic Stabilization Act (EESA) and \$2 billion appropriated through the Consolidated Appropriations Act of 2016, and promote economy, efficiency, effectiveness, and accountability in these economic stability programs. SIGTARP conducts investigations of suspected illegal activity, and also independently audits EESA long-term economic stability programs.

### **EESA has two parts:**

1. Short-term Treasury purchases of "troubled assets," which led to investments in banks, insurance companies and automotive companies - these programs have been largely completed, as has SIGTARP's work in this area; and
2. Long-term programs intended to bring economic stability to the financial industry and communities by protecting home values and preserving homeownership programs.

Under these long-term economic stability programs, Treasury and Fannie Mae (with assistance from Freddie Mac) run a program that funds incentives to more than 150 financial institutions, including some of the largest in our nation, to lower mortgage payments to terms that are affordable and sustainable for homeowners at risk of foreclosure. Treasury also funded grant-like programs administered by housing finance agencies in 19 states, including programs providing foreclosure relief to homeowners unemployed or underemployed due to the COVID-19 pandemic.

## ABOUT US

SIGTARP currently conducts criminal and civil investigations and independently audits and evaluates the EESA long-term economic stability programs - the Home Affordable Modification Program (HAMP) and the Hardest Hit Fund (HHF). Treasury, Fannie Mae, and state housing agencies respond to ongoing housing market issues through EESA programs, including national economic instability resulting from the COVID-19 pandemic.

- **HAMP:** HAMP continues to prevent foreclosures for more than 550,000 Americans after the lapse of the foreclosure moratorium in the CARES Act. Treasury and Fannie Mae pay incentives to financial institutions to lower mortgages to affordable and sustainable terms. Payments are not automatic but require institutions to follow the law and HAMP rules.
- **HHF:** In the Consolidated Appropriations Act of 2016, Congress authorized an additional \$2 billion and amended HHF from responding to the financial crisis to respond to ongoing housing market needs. State housing agencies used HHF to provide mortgage assistance for Americans facing unemployment and underemployment due to the pandemic. The HHF program closed in December 2021.

**SIGTARP Investigations:** Primarily a law enforcement agency, SIGTARP delivers justice and accountability for fraud, corruption, or other illegal acts that harm EESA programs and put taxpayer dollars at risk. SIGTARP has concurrent jurisdiction with the Federal Bureau of Investigation (FBI) and supports U.S. Department of Justice's (DOJ) prosecutions.

471 defendants have been criminally charged as a result of SIGTARP investigations. SIGTARP has a 96 percent DOJ conviction rate. To date, 416 defendants have been convicted, 321 of them sentenced to prison, while others await trial/sentencing. SIGTARP's investigations have led to prosecutions of more than 108 bankers (including 75 sentenced to prison) and DOJ enforcement actions against the largest banks. This proven record gives us the expertise to investigate financial institutions in HAMP. SIGTARP also found con artists who scammed nearly 31,000 homeowners trying to access HAMP, including 121 criminally convicted. SIGTARP also investigates fraud, corruption, and environmental crimes in EESA-funded blight demolitions, and investigates homeowners who stole from HHF.

More than \$11 billion has been recovered, yielding a cumulative 28 times return on investment. SIGTARP has one of the highest returns on investment of any Inspector General. Cumulatively, dollars recovered from SIGTARP's work far exceed our cost. So far in FY 2023, the government has recovered \$1,570,420.

**SIGTARP Audits:** SIGTARP's audits and evaluations previously identified roadblocks and obstacles to increase the speed of assistance to Americans, bring transparency, and prevent future fraud, waste, and abuse. The team's final product is a capping evaluation highlighting significant recommendations made by SIGTARP throughout the TARP program and the implementation status of these recommendations by Treasury.



# SIGTARP

SIGTARP CONDUCTS INVESTIGATIONS AND AUDITS OF LONG-TERM ECONOMIC STABILITY PROGRAMS MORE THAN **\$11 BILLION** RECOVERED

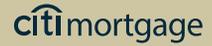
As of March 31, 2023

## The Making Home Affordable (MHA)

program pays lenders to lower mortgage payments for homeowners at risk of foreclosure.

\$22.3 billion has been spent, including \$122.9 million in FY 2023. Treasury made its final advance payment (\$22M) of all eligible incentives in March 2023, and will make a small true-up payment prior to closing the program on April 28, 2023.

## Recipients Includes:



## The Hardest Hit Fund (HHF)

helped unemployed and underemployed Americans pay their mortgages, demolished blighted homes, and funded homebuyer down payments.

As of the program closure in December 2021:

- \$9.5 billion was obligated to the program including \$96.7 million de-obligated in November 2022
- SIGTARP Audits and Evaluations completed
  - 18 reports
  - 4 alerts/management advisory letters
  - Made 221 recommendations
    - 78/35% implemented by Treasury
    - 96/43% partially implemented by Treasury

## Recipients Includes:



19 state agencies



378 cities or counties and 503 local partners



More than 1,700 demolition contractors



Homeowners & homebuyers



# SIGTARP



Including



# \$11 Billion =

Recovered from Investigations



As of March 31, 2023 | Convictions include four vacated due to death or cooperation | Charges are not evidence of guilt | Many defendants await trial and sentencing  
Return on investment based on SIGTARP's annual budget 2010 - 2023



# SIGTARP

SIGTARP investigations have led to enforcement actions against

# TWENTY FIVE

institutions





# SIGTARP

Through March 31, 2023 | BY THE NUMBERS

Fiscal Year 2023	
Dollars Recovered (Thousands)	\$1,570.4
Criminal Charges	2
Arrests	0
Convictions	5
Sentenced to Prison	6
Debarments	0
Justice Department Referrals	0
State Referrals	2
Prosecutor Declinations	4

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SIGTARP'S OVERSIGHT OF MAKING HOME  
AFFORDABLE AND HOME AFFORDABLE  
MODIFICATION PROGRAMS

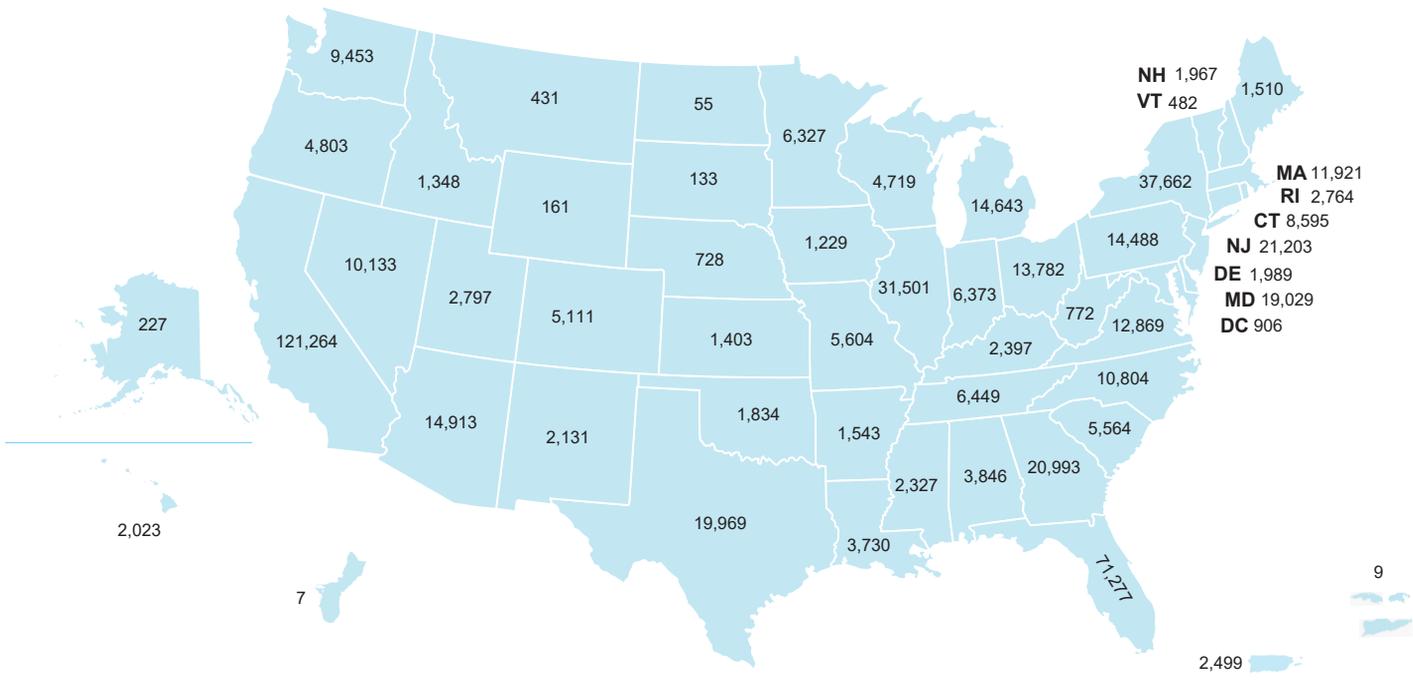
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SIGTARP's top law enforcement priority is to investigate and bring to justice unlawful conduct by financial institutions in HAMP. Our nation cannot have a resilient housing market if financial institutions and consumers violate the law. SIGTARP's top audit priority is to identify risk/vulnerabilities in HAMP that would hurt homeowners and impede Treasury's goal to provide affordable and sustainable homeownership.

## HAMP IS PREVENTING FORECLOSURES FOR MORE THAN 550,000 PARTICIPANTS WHO LIVE IN ALL 50 STATES

HAMP remains critical to the economic growth and recovery of 550,742 Americans as of March 2023. HAMP provides fair access to home ownership by financial institutions modifying mortgages to be affordable and sustainable.

### OVER 550,000 HOMEOWNERS CURRENTLY IN HAMP



## SIGTARP'S OVERSIGHT OF HAMP

SIGTARP conducts criminal and civil investigations and independent audits and evaluations of HAMP. SIGTARP has a number of open, confidential investigations in this area, several of which have been referred to DOJ. SIGTARP also found con artists who scammed nearly 31,000 homeowners trying to access HAMP, resulting in 101 sentenced to prison.

Federal payments are not automatic and require the financial institutions administering HAMP to follow the law and rules.

### TOP 10 FINANCIAL INSTITUTIONS AND TOTAL SPENT IN FY 2023

1	PHH Mortgage, subsidiary of Ocwen Loan Servicing, LLC	\$27,448,542
2	Select Portfolio Servicing, Inc.	\$27,265,829
3	Nationstar Mortgage, LLC	\$17,799,237
4	Wells Fargo Bank, N.A.	\$5,647,662
5	Specialized Loan Servicing	\$6,503,959
6	JPMorgan Chase Bank, NA	\$6,449,480
7	MidFirst Bank	\$5,315,790
8	Bank of America, N.A.	\$4,458,434
9	Carrington Mortgage Services, LLC	\$2,398,268
10	CitiMortgage, Inc.	\$2,864,715
	157 Other Institutions	\$16,704,402
	<b>\$ Spent in FY 2022</b>	<b>\$122,856,317</b>

Source: SIGTARP's March 31, 2023 analysis of Treasury's most recent MHA data; Treasury, Housing Transaction Report - March 2023

## CUMULATIVE SPENDING IN THE MAKING HOME AFFORDABLE PROGRAM



**\$22.3 Billion** *Dollars paid*

Source: SIGTARP's March 31, 2023 analysis of Treasury's most recent MHA data; Treasury, Housing Transaction Report - March 2023

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SIGTARP'S OVERSIGHT OF TREASURY'S  
TARP INVESTMENTS IN BANKS AND  
SECURITIES TRADING

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## RESULTS OF SIGTARP'S BANK INVESTIGATIONS

SIGTARP continues to support criminal prosecutions by DOJ of TARP bankers and co-conspirators, as well as parallel civil actions by the Securities and Exchange Commission (SEC). The bank fraud, securities fraud, money laundering, and other crimes and civil violations of law uncovered by SIGTARP hurts banks' stability and their ability to lend to communities.



**BANKERS**  
108 INDICTED  
95 CONVICTED\*  
75 SENTENCED  
TO PRISON  
81 INDUSTRY BANS

**BANKER  
CO-CONSPIRATORS**  
100 INDICTED  
87 CONVICTED  
72 SENTENCED  
TO PRISON

**BORROWERS  
DEFRAUDING BANKS**  
58 INDICTED  
54 CONVICTED  
43 SENTENCED  
TO PRISON

As of March 31, 2023

\*Includes two convictions vacated due to death or subsequent cooperation with the Government.

## INVESTIGATIONS AND PROSECUTIONS DO NOT END WHEN A BANK EXITS TARP

Just as a bank robber cannot escape prosecution by returning the stolen money, a banker defrauding a TARP bank cannot escape prosecution by DOJ simply because the bank exited TARP. The bankers that SIGTARP investigates have engaged in money laundering, fraud, or other crimes against the bank. These are not victimless crimes. These crimes destabilize the bank, often cause losses, and hurt the bank's ability to lend to its communities. Bankers committing these crimes must be held accountable through the criminal justice system and removed from the bank. The same is true for civil charges by the SEC against bankers at public companies.

SIGTARP has brought landmark cases that changed the Federal Government's bank prosecutions. Since the Savings & Loan Crisis, the DOJ has largely limited prosecutions to cases where the banker had some conflict of interest and made a personal profit. SIGTARP found that during the Great Recession, some bankers fraudulently inflated the bank's financial condition so that bank regulators, Treasury, and the investing public would not know about the decline in the financial condition. Some of these banks failed. Some raised capital from investors based on false financials. Some used those artificially inflated financials to obtain TARP funding.

Bank investigations and prosecutions are complex and lengthy. The ten-year statute of limitations recognizes the time it takes for the government to find the crime, investigate it, and bring criminal charges. Once SIGTARP refers the case to DOJ for prosecution, SIGTARP works with the prosecutors until the prosecution is complete, which can take years.

The bank may exit TARP during the investigation and/or prosecution, which has no bearing on SIGTARP's work. There is currently one credit union remaining in TARP. Cooperative Center Federal Credit Union owes \$559,000.

While some of our bank investigations remain confidential, we are reporting on the public results.

## SIGTARP'S INVESTIGATIVE RESULTS IN THE LAST SIX MONTHS

### **Former CEO of TARP Bank Sentenced for Participating in a Bribery Scheme in Connection with Loans Guaranteed by the Small Business Administration**

On October 6, 2022, Edward Shin was sentenced to fourteen months imprisonment, three years of supervised release, and ordered to forfeit \$5,506,050 for his role in a bribery scheme as the former CEO of Noah Bank. Shin caused the Bank to issue millions of dollars of Small Business Administration (SBA)-guaranteed and commercial loans to companies in which he held a secret financial interest.

These charges were brought about by a joint investigation with SIGTARP, Federal Deposit Insurance Corporation Office of Inspector General, Homeland Security Investigations, and SBA Office of Inspector General (SBA OIG). This case was prosecuted by the United States Attorney's Office for the Southern District of New York.

### **Kansas Business Owner Sentenced for Defrauding a TARP Recipient Bank**

K. Kevin James owned and operated several construction companies in Kansas. These companies secured a line of credit with Blue Valley Bank, a TARP recipient bank. Beginning in 2009 through 2011, K. Kevin James participated in a scheme to provide falsified financial statements for the construction companies to Blue Valley Bank misrepresenting the true financial condition of the construction companies. In May 2011, the James' construction companies filed for bankruptcy, resulting in a loss of over \$3 million to Blue Valley Bank. On November 14, 2022, K. Kevin James was sentenced to 12 months imprisonment and two years supervised release, and ordered to make \$6,159,892 in restitution. The case was prosecuted by the U.S. Attorney's Office for the District of Kansas.

### **Illinois Real Estate Developer Sentenced for Scheme to Defraud TARP Bank**

On December 28, 2022, See Wong, the owner of a real estate development company in Illinois was sentenced to sixteen months in prison and two years of supervised release for wire fraud for defrauding a bank while it was in TARP. He was also ordered to pay \$1,659,457 in restitution. To receive construction loans to build condominiums in Chicago, the banking contracts required the defendant to put buyer deposits into an escrow account at the bank. Instead, he diverted deposits to fund his portion of construction costs and a personal loan to a friend. Victim purchasers lost approximately \$1 million, and the bank lost approximately \$1.8 million. SIGTARP was joined in the investigation by the FBI. The U.S. Attorney's Office for the Northern District of Illinois prosecuted the case.

### **Two Defendants Convicted in Operation Phantom Bank**

SIGTARP's investigation of TARP recipient Saigon National Bank resulted in the guilty pleas of two additional defendants. On December 2, 2022, Jack Nguyen, pled guilty to money laundering charges and is scheduled to be sentenced in Summer 2023. On January 20, 2023, co-defendant Lien Tran also pled guilty to money laundering charges and is scheduled for sentencing in July 2023.

“Operation Phantom Bank” was a long-term money laundering investigation conducted by SIGTARP and its law enforcement partners, the FBI and Internal Revenue Service-Criminal Investigation. This case resulted in six indictments that charged a total of 25 defendants. Convictions to date include a former shareholder of Saigon Bank, an East West Bank Vice President, a high-level Mexican money launderer, the former president of the Chinese Consolidated Benevolent Association, and several domestic money launderers with ties to Armenian Power and Chinese Triads organized crime groups. One additional defendant is pending trial on money laundering charges and two additional defendants are currently fugitives, one located in Hong Kong and the other in Lichtenstein. This case is being prosecuted by the U.S. Attorney’s Office in the Central District of California.

### **New Jersey Defendant Sentenced for Role in Scheme to Defraud Bank and Bank Regulators**

On January 31, 2023, Gary Ketchum, who conspired with the former CEO of First State Bank to defraud the bank and its regulator, the FDIC, was sentenced to three years of probation and ordered to forfeit \$175,000. Ketchum participated in a scheme in which material misrepresentations were made to obtain millions of dollars in loans from First State Bank, which were fraudulently made into a capital infusion by other co-conspirators to deceive the FDIC on the financial strength of the bank. First State Bank previously applied for TARP funding to bolster their financial position, but later withdrew their application. This case was prosecuted by the U.S. Attorney’s Office in New Jersey.

### **Co-Conspirator Sentenced for Participating in a Bribery Scheme with Former Bank CEO In Connection with Loans Guaranteed by the Small Business Administration**

On February 2, 2023, James Kim was sentenced to one year of supervised release and ordered to forfeit \$3,670,000 for his role in a bribery scheme with the former CEO of Noah Bank in connection with hundreds of thousands of dollars in loans guaranteed by the SBA, and with causing the Bank to issue millions of dollars of SBA-guaranteed and commercial loans to companies in which the former CEO had a secret financial interest.

These charges were brought about by a joint investigation with SIGTARP, the FDIC OIG, HSI and SBA OIG. This case was prosecuted by the United States Attorney’s Office for the Southern District of New York.

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# SIGTARP'S OVERSIGHT OF THE HARDEST HIT FUND

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## SIGTARP'S OVERSIGHT

SIGTARP conducts oversight through investigations, audits, and evaluations of EESA's \$9.6 billion HHF, announced by President Obama in 2010 and expanded in 2016 by Congress (which moved \$2 billion to HHF from HAMP). HHF provided \$9.6 billion to 19 state housing finance agencies to address ongoing local housing needs. Treasury allowed state agencies to recycle back into the program interest and recoveries from liens. Recoveries from SIGTARP investigations and audits were also recycled back into the program.

SIGTARP investigates and supports the prosecution of corruption, fraud, and environmental crimes in demolitions of blighted properties under HHF. We continue to bring justice to individuals who defrauded the HHF mortgage assistance program, even after closure of the program in December 2021.

SIGTARP auditors and evaluators helped ensure that the assistance effectively reached those beneficiaries by identifying obstacles, roadblocks, waste, abuse, and risks of violating program rules.

## SIGTARP INVESTIGATIONS

As with all investigations, SIGTARP investigations for criminal and civil violations of the law are backwards-looking, seeking justice and accountability for past violations of the law, and assisting in recovering dollars lost to fraud. Fraud, waste, and abuse cannot happen while federal funds are unspent and safe in a government account. Criminal and civil law enforcement actions take time to investigate and prosecute through the courts. A non-complex criminal investigation and prosecution of crime in HHF can take three to five years, which is extended for more complex cases. The fact that a state agency may close its HHF program while SIGTARP's investigation is pending will not stop SIGTARP or prosecutors (such as the DOJ and state Attorneys General) from bringing justice and accountability to individuals or entities that violated the laws and could do so again. Prosecutions have already resulted in prison sentences, convictions, payment of losses and fines, and contractor bans.

### **SIGTARP INVESTIGATIONS IN THE HHF BLIGHT DEMOLITION SUBPROGRAM**

SIGTARP investigates corruption, bribery, other anti-competitive acts, fraud, environmental, safety and other crimes, as well as civil violations of the law or program rules in the HHF blight demolition subprogram. SIGTARP spends significant resources investigating crimes that could have been deterred if: (1) Treasury had implemented SIGTARP's prior audit recommendations, (2) Treasury had implemented controls to mitigate the risk of contaminated dirt, asbestos exposure, and illegal dumping in HHF blight demolitions, and (3) Treasury had mitigated anti-competitive actions in demolition contracts.

SIGTARP has a number of ongoing confidential criminal investigations and is working actively with the DOJ and state Attorneys General offices. Public results of our investigations include:

#### ***\$1.5 Million Civil Settlement Reached with the Detroit Land Bank Authority for Claims Related to Unsubstantiated Backfill Costs in Connection with the Blight Elimination Program***

On February 21, 2023, a \$1,503,000 civil settlement was reached between the federal government and the Detroit Land Bank Authority (DLBA) to resolve claims against the DLBA for its submission of unsubstantiated backfill dirt costs invoiced to the DLBA by demolition contractors from December 2016 through June 2022. The DLBA utilized federal funds from the U.S. Department of the Treasury's Troubled Asset Relief Program-Hardest Hit Fund to reimburse contractors for backfill dirt used at blight demolition sites.

## SIGTARP'S INVESTIGATIVE RESULTS IN THE LAST SIX MONTHS

### **Michigan Man Sentenced for Defrauding Mortgage Assistance Program Funded by Hardest Hit Fund**

On October 28, 2022, Seneca Daniel was sentenced to probation and ordered to make \$15,390 in restitution in connection with defrauding the Step Forward Michigan Program, a housing assistance program administered by the Michigan State Housing Development Authority and funded by the U.S. Treasury under the Hardest Hit Fund. Michigan's Attorney General prosecuted the case.

### **California Man Pleads Guilty and is Sentenced on Fraud Charges in connection with Keep Your Home California Mortgage Assistance Program**

On December 2, 2022, Hans Hoehn of West Hills, California pled to charges for committing unauthorized computer access fraud involving the Keep Your Home California (KYHC) mortgage assistance program. The KYHC program was funded by HHF to help prevent foreclosure for homeowners that were unemployed. Hoehn admitted to fraudulently receiving \$36,420 in mortgage assistance benefits from this program after he became re-employed. He was sentenced to eighty hours of community service and paid \$36,420 in restitution prior to his sentencing. This case was prosecuted by the Los Angeles District Attorney's Office in California.

### **Indiana Woman Pleads Guilty and is Sentenced on Welfare Fraud in connection with Unemployment Bridge Program**

On January 9, 2023, Natasha Banister of Pendleton, Indiana pled guilty and was sentenced to twenty months in prison (time served) and twenty months of probation for committing welfare fraud against the State of Indiana, Unemployment Bridge Program (UBP). The UBP provided mortgage assistance benefits from the HHF to help prevent foreclosure for homeowners that were unemployed. In 2014 and 2015, Banister admitted that she submitted false documents and certifications which led to the receipt of \$28,514 in fraudulent UBP assistance. This case was prosecuted by the Madison County District Attorney's Office in Indiana.

## SIGTARP AUDITS

SIGTARP audits and evaluations have improved the effectiveness and efficiency of HHF mortgage assistance programs by reporting on poor performance and, in one case, mismanagement by individual state agencies and identifying obstacles to the timely distribution of assistance. SIGTARP audits and evaluations of HHF blight demolition programs have identified abuse of the program. For example, the program was fraudulently used to demolish lived-in houses on the desired relocation site of a car dealership. Additionally, SIGTARP warned Treasury about risks to the health and safety of communities, and risks of anti-competitive behavior in the bidding and awarding of contracts. SIGTARP made recommendations that, if implemented, could have deterred fraud and other crimes found by SIGTARP investigations. SIGTARP also audits administrative costs of participating state housing agencies.

SIGTARP's audit products recommended \$13 million in administrative and non-administrative costs that could be recovered for the HHF program. This retrospective work on past spending resulted in Treasury recovering and deterring funds lost to waste and abuse. Although Treasury only recovered a small fraction of the waste identified by SIGTARP, Treasury implemented some of SIGTARP's important recommendations to improve Treasury's review of administrative expenses.

SIGTARP's final evaluation was an analysis of previously issued HAMP and HHF recommendations. Objectives were to summarize the findings and recommendations SIGTARP made in its reports and other products on HHF and HAMP, to assess the status of the recommendations, and to identify lessons learned for ongoing and future housing programs.

SIGTARP's products identified findings that led to 285 recommendations on the HHF (221) and HAMP (64) programs. SIGTARP organized its recommendations by three categories including (1) promote economy, efficiency, and effectiveness of the programs; (2) prevent and detect fraud, waste, and abuse; and (3) promote transparency and accountability. Nearly 50% of the recommendations aimed to promote economy, efficiency, and effectiveness of HHF and HAMP, while 40% of the recommendations sought to prevent and detect fraud, waste, and abuse.

Treasury fully implemented 98, or 34 percent, of SIGTARP's recommendations and partially implemented 105, or 37 percent. Treasury's implementation of these recommendations resulted in program changes that enabled more eligible struggling homeowners to receive much needed assistance, recoveries of wasted program funds, and greater protections from fraud, waste, and abuse. Almost 30 percent of SIGTARP's recommendations remain unimplemented, representing missed opportunities to further enhance the programs and lessons learned for future housing and federal programs.

This evaluation did not issue new recommendations, focusing on the implementation status of SIGTARP's prior products including audits, evaluations, and letters.

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PEER REVIEWS

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## SIGTARP PEER REVIEWS

### **Investigations**

The Quality Assessment Review of Investigative Operations is scheduled for 2023.

### **Audits**

SIGTARP completed two peer reviews during this period.

- On January 20, 2023, SIGTARP issued the System Review Report on the Corporation for Public Broadcasting OIG's audit organization.
- On March 22, 2023, SIGTARP issued the System Review Report on AmeriCorps OIG's audit organization.

The Inspections and Evaluations Review of Audit Operations is scheduled for April 2023<sup>1</sup>.

The most recent review is available on SIGTARP's website at [www.SIGTARP.gov](http://www.SIGTARP.gov), under "Peer Review Report."

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<sup>1</sup>The Consumer Product Safety Commission Office of Inspector General kicked off the Inspection and Evaluation peer review of SIGTARP's audit operations on April 5, 2023.

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The Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) is a federal law enforcement agency and an independent audit watchdog that targets financial institution crime and other fraud, waste, and abuse.

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