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Strategies to Combat Tenant Fraud in the Rental Housing Market

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Walden University
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Abstract

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by

Gwendolyn B. Dawson

MBA, Nova Southeastern University, 1990

BS, University of Florida, 1985

Doctoral Study Submitted in Partial Fulfillment

of the Requirements for the Degree of

Doctor of Business Administration

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Abstract

Many business executives lack strategies to detect and eliminate tenant fraud in subsidized rental housing. The purpose of this multicase study was to explore strategies some business executives used to detect and eliminate tenant fraud in subsidized rental housing. The conceptual framework used to guide this study was the theory of planned behavior. Data were gathered using semistructured interviews with 6 purposively selected business executives of public housing authorities, supplemented with a review of policies and procedures that business executives used. Yin's 5-step analysis, which entails examining, categorizing, tabulating, creating a data display, and testing the data, guided the process of coding participants' responses. Member checking validated that emerging themes were in alignment with participant experiences. The 4 major themes of the study were: perception of tenant fraud, detection and minimization of fraud, the effect of fraudulent behavior on tenant attitudes and belief systems, and verification procedures. The results of the study might support positive social change by providing leaders with insights related to fraud-reducing fragmentation, duplication, and overlapping of programs, which may result in federal funds being available for federal government public services. The findings of this study might add to the body of knowledge and further contribute to social change through a coalition of housing agencies working together to share their knowledge of combatting tenant fraud in subsidized rental housing and restoring the integrity of the Housing Choice Voucher Program.

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Dedication

I dedicate this study in loving memory of my beautiful, sweet, and loving rose—

my mother, Mrs. Jacquelyn J. Brewton. My only regret is that you did not live long

enough to witness me complete what you have always encouraged me to do, which is to

pursue my dream of earning a doctoral degree. You have always purposed in my heart to

continue reaching for the stars until I touched them. However, I know your spirit resided

in me and guided me every step of the way on this incredible journey; and I am confident

you have continued to watch over me with love and care. I also dedicate this study to a

phenomenal, gentle giant—my husband, Reverend Winston Dawson, for your many

sacrifices demonstrated daily through your love, concern, and patience. You have done

so much to ensure I was able to complete this study with the least amount of distraction as

possible. You were extremely flexible and always adjusted to my adjustments, without

ever complaining. I love you beyond measure and I thank God for love and support!

Acknowledgments

First, I give thanks, honor, and all praises to God for his grace and mercy on this phenomenal journey; for giving me the strength and faith to persevere when I thought I could not go on. I extend Hallelujah, the highest praise to God, for blessing me with an extraordinary family who endured with me every step on this journey. I acknowledge my loving, patient, and devoted husband, Reverend Winston Dawson, and I acknowledge my daughter, Wantanisha Jacquelyn Dawson Morant, and my Goddaughter, Rina Brown-Bradley. Thank you both for being my biggest cheering squad and for encouraging me during many tireless nights, to continue pressing and praying my way to the finish line. I express special gratitude to the two of you for traveling this incredible journey with me, as we cheered one another along the way to reach our goals. Next, I would like to extend my sincere appreciation to my amazing doctoral study chair, Dr. Marilyn Simon, without whom I could not have accomplished this study. I appreciate your support, nurturing, guidance, lessons taught, and genuine care and concern for me. You were the captain of my cheering squad and providing not only much needed encouragement, but also firm direction when appropriate. I also acknowledge and extend appreciation to Dr. Jorge Gaytan and the rest of my doctoral study committee members to ensure my study met the required academic standards of Walden University. Finally, I acknowledge the participants for their willingness to share information that was an integral part of this study.

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Section 1: Foundation of the Study

Over 3,300 public housing authorities (PHAs) received approximately $17.4

billion from the U.S. Department of Housing and Urban Development (HUD) for rent

subsidies to administer the Housing Choice Voucher (HCV) program in 2015. PHAs

provide rental subsidies to 2.2 million low-income families annually (Center on Budget

and Policy Priorities, 2018). Many potential tenants make false claims to gain eligibility

for rental housing assistance, and some housing authority officials mismanage and

embezzle federal funds (McClure, Schwartz, & Taghavis, 2014). Subsidized rental

housing fraud often involves collaboration between staff or with a property owner or

tenant (Olsen, 2014). This study focused on tenant fraud only. Research identifying

specific strategies to detect and minimize fraud is lacking (Olsen, 2014). In this study, I

sought expert opinion on strategies to mitigate tenant fraud in the subsidized rental

housing market.

Background of the Problem

The largest and most popular federally subsidized rental-housing program is the

HCV program, which received an allocation of $17.4 billion in 2015 to serve 2.2 million

low-income households (Center on Budget and Policy Priorities, 2018). Public housing

authorities manage the HCV program under a voucher program (Jacobs & Manzi, 2014;

McClure et al., 2014). Applicants or beneficiaries are responsible for finding their

housing unit and paying approximately 30% of their gross monthly income for rent and

utilities (Greenlee, 2014; Hoffman, 2012). The PHA pays the remainder of the rent

directly to the property owner (Seicshnaydre, 2016). As private individuals own the

subsidized properties and the government pays subsidies directly to businesses, HCV program fraud directly affects the financial stability of business owners (Greenlee, 2014).

Leaders of the U.S. Government Accountability Office (GAO) have designated federal programs such as the HCV program, as *high risk* because of their susceptibility to fraud, waste, mismanagement, and abuse (Walter & Wang, 2016). The Federal Government has lost billions of dollars in these programs due to management control failures (Greenlee, 2014). Despite HUD leaders' progress in developing and implementing systems to detect fraud and abuse, both have continued to grow exponentially in subsidized rental housing programs (Greenlee, 2014). In 2013, the HCV program encountered the sharpest increase in the number of fraud cases in all HUD-funded programs, which reached four times more than HCV fraud cases in 2010 (U. S. GAO, 2014). Individuals working in the HCV program also experienced the greatest dollar volume of fraud cases in all HUD-funded programs, which was 2.5 times more than in 2010 (U. S. GAO, 2014). Housing leaders disbursing fraudulent subsidized rental housing payments place a substantial financial burden on state and federal government financial systems.

Problem Statement

In 2016, officials of the U.S. Department of Justice convicted more than 300 individuals in cases of subsidized rental housing fraud in PHAs (U.S. Department of Justice, 2018). Fraud threatens the national defense, as housing management misappropriation costs taxpayers over $1.2 billion per year (McClure et al., 2014). The general business problem is the high cost of tenant fraud in the rental housing market.

The specific business problem is that some business executives lack strategies to detect and eliminate tenant fraud in subsidized rental housing.

Purpose Statement

The purpose of this qualitative multicase study was to explore strategies some business executives use to detect and eliminate tenant fraud in subsidized rental housing. The target population of this study consisted of six business executives located in central Florida, possessing successful experience in detecting and eliminating tenant fraud in subsidized rental housing. This study might contribute to positive social change through finding strategies that deter fraudulent criminal activities in rental housing and increase revenues for private business owners of subsidized rental properties. Housing leaders might benefit from this study by garnering a greater understanding of effective leadership models and strategies used to combat tenant fraud. Another advantage might be increasing housing leaders' ability to implement strategies to deter the escalation in subsidized housing costs. This approach would help to ensure funds remain available to meet the housing needs of Americans living below the poverty level. Implications for positive social change included the potential for reducing or eliminating fragmentation, duplication, and overlapping of government programs. This strategy could increase federal funds for other important government public service departments, such as the U.S. Department of Defense and the U. S. Department of Homeland Security.

Nature of the Study

The research method used for this study was qualitative. The three types of research methods available were qualitative, quantitative, and mixed methods Hair,

Wolfinbarger, Money, Samouel, & Page, 2015; Lewis, 2015; McCusker & Gunaydin, 2015). Qualitative research is subjective because its focus is on issues that researchers cannot measure accurately and precisely, and it includes inductive reasoning to synthesize data (Alsaawi, 2014; Ashworth, 2015; Hafford-Letchfield, 2014). A focus on identifying strategies to combat tenant fraud in the rental housing market aligned well with the qualitative research methodology. The alignment is a result of data collected from participants who invoke their subjectivity and share their best strategies for combating tenant fraud.

Quantitative researchers apply a numeric description of the attitudes, trends, or opinions of a group by examining a section of the group (Barnham, 2015; Hunt, 2014; McCusker & Gunaydin, 2015; Quick & Hall, 2015). Quantitative researchers focus on evaluating and testing theories to determine if a distinct action influences an outcome (Barnham, 2015; Hunt, 2014; McCusker & Gunaydin, 2015). Quantitative researchers have the goal of studying and testing a theory or examining causal relationships (Hunt, 2014; Landrum & Garza, 2015; Quick & Hall, 2015). Consequently, quantitative research was not appropriate for this study. A researcher conducting a mixed-methods research study could cancel any biases from either method (Hafford-Letchfield, 2014; Johnson, 2015; McCusker & Gunaydin, 2015). Researchers using the mixed-methods research methodology select both quantitative and qualitative methods to explore a phenomenon (Hafford-Letchfield, 2014; Hussein, 2015; Johnson, 2015). Mixed-methods researchers use the quantitative portion of research to quantify and analyze factors (Hafford-Letchfield, 2014; Hussein, 2015; McCusker & Gunaydin, 2015). A mixed-

methods methodology for this study is not appropriate because I will not quantify and analyze factors.

Case study researchers use diverse sources of information to develop detailed descriptions of phenomena (Isaacs, 2014; Robinson, 2014; Yin, 2014). I will conduct an exploratory multicase research study to explore strategies that business executives and owners use to detect and eliminate subsidized rental housing tenant fraud. Qualitative researchers advocate fostering comprehension through exploring and clarifying connotations ascribed by individuals to experience certainties (Burchett, 2014; Isaacs, 2014; Morse, 2015). A case study design involves an in-depth exploration of an issue or a problem with a single participant, timeframe, or group (Dasgupta, 2015; Nie, 2017; Sugar, 2014). In addition to semistructured interviews of participants, I analyzed agency policies, procedures, and internal controls to identify the strategies used to combat rental-housing fraud.

I considered the phenomenological design of a qualitative research method, but it would have been inappropriate for this study. Researchers using the phenomenological design focus their data collection solely on individual perceptions and ignore information available in documents (Hunt, 2014; Peyrovi, Raiesdana, & Mehrdad, 2014; Pfaff, Baxter, Ploeg, & Jack, 2014). Focusing only on individual perceptions and ignoring other information would have lessened the scope of my study. The focus of a narrative design is on life experience and understanding the way people create meaning in their lives as narratives (Lewis, 2015, 2015; Pringle, 2016; Yin, 2014). Therefore, the narrative design strategy did not fit the scope of the study.

Research Question

The overreaching research question for this study was: What strategies do business executives use to detect and eliminate tenant fraud in subsidized rental housing?

Interview Questions

I used the following semistructured interview questions to allow participants to explain their in-depth experiences and knowledge regarding the problem of rental housing tenant fraud and abuse in central Florida.

1. How have you perceived the problem of tenant fraud and abuse in the Housing Choice Voucher (HCV) program?

2. What have been your specific experiences regarding tenant fraud and abuse in the HCV program?

3. How have the tenant fraud cases you have been involved in, revealed the perpetrators' attitude correlated to what provoked their fraudulent behavior?

4. How have the tenant fraud cases you have been involved in, revealed the perpetrators' belief system correlated to what provoked their fraudulent behavior?

5. What specific strategies have you implemented to detect and minimize tenant fraud in the HCV program?

6. In your estimation, how effective were the anti-fraud strategies you implemented?

7. What regulatory changes do you believe are necessary at the national level to help develop effective strategies for combating tenant fraud in the HCV program?

8. What other information, if any, would you like to share concerning HCV program implementation or the success or failure of antifraud actions?

Conceptual Framework

The theory of planned behavior (TPB) was the conceptual frameworks for this study. Ajzen derived the TPB in 1985 from an expansion of the theory of reasoned action, which Fishbein proposed in 1980 (Ajzen, 2015). Researchers studying the theory of reasoned action focused on the high correlation of individual attitudes and subjective norms to what provoked certain behavioral intentions (Ajzen & Sheikh, 2016; Teng, Wu, & Liu, 2015).

Researchers applying the TPB address the attitudes, belief systems, and subjective norms that influence human behavior (Ajzen, 2014; Chen, 2016; Gagnon, Cassista, Payne-Gagnon, & Martel, 2015). The TPB encompasses the concept that an individual's attitude toward behavior, perceived behavioral control, and subjective norms shape behavior and behavioral intentions (Ajzen, 2015; Chen, 2016; Lortie & Castogiovanni, 2015). Housing leaders using the TPB might develop investigative skills to address dishonest tenants who engage in unethical business practices. The TPB was an appropriate framework for my study because the participants represented various levels of administration of influence and decision-making authority. The diversity of participants and the specific socioeconomic conditions of the geographical location of my study

aligned with the TPB. Using this framework to explore factors contributing to HCV tenant fraud and abuse may corroborate research efforts to identify strategies for mitigating rental housing market fraud.

Operational Definitions

Business executives: Business executives are individuals working in the rental housing market, including PHA and HUD staff.

Business owners: Business owners are individuals owning or managing subsidized rental property, (i.e., landlords).

Extremely low income: Extremely low income is a household's income level that is at or below 30% of the median income of a metropolitan area, adjusted for household size (Nordvik, 2015).

Gross monthly income: Gross monthly income is a household's total yearly income amount before deducting taxes and making other deductions divided by 12. Gross income typically includes all employment income, including interest and dividend income, social security benefits, welfare benefits, and child support received; retirement benefits; military and veteran's disability payments; unemployment benefits; and other income amounts the Secretary of HUD may consider appropriate (Graves, 2016).

High rent burden: A high rent burden exists when a family pays more than 50% of the family's total monthly household income toward rent and utilities (Jung, Fertig, & Metraux, 2014).

Low income: Low income is a household's income level that is at or below 80% of the area median income, adjusted for family size. Agency leaders use the income

guideline of low income as the maximum amount for determining eligibility for some

government-subsidized programs such as the Public Housing Program (Varady, Jaroscak,

& Kleinhans, 2017).

Office of Policy Development and Research (OPDR): The staff of the Office of

Policy Development and Research (OPDR) in HUD is responsible for preserving and

providing current information on market conditions, housing needs, existing programs,

and conducting research on housing and community development high-priority issues.

The OPDR staff provides credible and unbiased data and analyses to assist in formulating

policies (HUD, 2001).

Public housing authority (PHA): A PHA is any state, county, municipality, or

other governmental entity; public body; agency; or instrumentality of these entities that

operates under the Housing Act of 1937 to administer housing programs and services for

very-low income and low-income families. Public housing authorities typically have a

charter under state statues and receive the bulk of their funding from HUD (Seicshnaydre,

2016).

U.S. Department of Housing and Urban Development (HUD): Congress

established HUD in 1965 with the primary mission of increasing homeownership

opportunities; supporting community development; and improving access to safe,

sanitary, and affordable rental housing and homeownership free from illegal

discrimination. HUD officials govern and fund the majority of the PHAs in the United

States (Huth, 2014).

Very low income: Very low income is a household's income level that is at or below 50% of the area's median income, adjusted for family size. Agencies use the income guideline of very low income as the maximum amount for determining eligibility for some government-subsidized programs such as the HCV program (Varady et al., 2017).

Assumptions, Limitations, and Delimitations

Assumptions are statements accepted as true without proof (Simon & Goes, 2013). Limitations are potential weaknesses in the design or methodology of a study that could affect the application or interpretation of the results of the study (Simon & Goes, 2013). Delimitations are features of a study chosen to set the scope and boundary of the study to answer the research question and resolve the problem identified (Simon & Goes, 2013).

Assumptions

The assumptions steer the data gathering and exploration methods in a research study (Simon & Goes, 2013). The first assumption was that the PHA staff participants would be experienced and knowledgeable about the HCV program. They did not require an explanation of the HCV program or the various acronyms used in the field of subsidized housing.

A second assumption was that none of the participants would have a history of being perpetrators of fraudulent activities in the HCV program. I compared the participants' names against the HUD debarment list to ensure they were not on the list, which prohibits them from doing business with HUD. A third assumption concerned the

integrity of the interview process. I assumed the participants would answer the interview questions with honest, candid, and comprehensive responses.

A fourth assumption was the documents I had planned to review would include an accurate and comprehensive depiction of agency positions and individual perceptions regarding subsidized housing tenant fraud. Organizational documents are a mode of communication that visibly represents the principles and cultural determinants that depict organizations (Merriam & Tisdell, 2015).

Limitations

Small sample size was the first limitation of the study, as several researchers (Boddy, 2016; Cleary, Horsfall, & Hayter, 2014; Gentles, Charles, Ploeg, & McKibbon, 2015) claimed that a small sample size may not apply to a broader population. Participant and researcher bias was a second limitation. The participants' biased responses to interview questions and researchers' biased interpretation of the data have an effect on research findings (Liedtka, 2015; Yin, 2015). A third limitation of the study was that the results of the study would not be transferable to other governmental organizations.

A fourth limitation of the study was that the number of participants I had planned to interview might potentially limit diversity among the study participants. Limited diversity might limit the opinions and perceptions of participants (Boddy, 2016). A fifth limitation of the study was the selection of a case study design. Findings may potentially not be transferrable to another geographic location or other federally subsidized housing

programs. The sixth and final limitation was that the results of the study would not be transferable to the HCV program that every PHA administers.

Delimitations

Delimitations are features of a study that researchers choose to set the scope and boundary of the study to answer the overreaching research question (Mitchell & Jolley, 2010). I anticipated several delimitations that might have impeded the generalization of the study, including the (a) problem I chose for the study, (b) location of the study, (c) sample size, and (d) participants.

Although GAO officials have identified federal programs as high risk (Greenlee, 2014), I elected to study tenant fraud and abuse within the HCV program. I focused on exploring strategies to mitigate tenant fraud in the subsidized rental housing market, with a special emphasis on the HCV Program. The targeted area of research was PHAs located in central Florida.

Sample adequacy and data saturation are key elements for determining the appropriate sample size to use for research interviews (Boddy, 2016; Cleary et al., 2014; Palinkas et al., 2015). Robinson (2014) purported a small sample size of 10 or fewer participants are ideal for qualitative research. A sample size between two and six participants is adequate for a case study (Gentles et al., 2015; Yin, 2014, 2015). Purposeful sampling, a nonprobability method, involves the researcher purposely selecting participants who are well suited for the study (Barratt, Ferris, Lenton, 2015; Boddy, 2016; Wilson, 2014). Using purposeful sampling, I selected six business executives from PHAs located in central Florida.

Significance of the Study

Housing leaders might apply the findings of the study, which could lead to the federal government funding a research project to study subsidized rental housing fraud on a greater magnitude. The study might lead to the federal government focusing on the other two areas of rental housing fraud, business executives and owners. Expanded research projects might transcend into the development of mechanisms the government can build upon globally and provide financial support for implementation.

Contribution to Business Practice

Researchers conducting studies on federally subsidized housing programs have primarily focused on administrative simplification (Ellen, 2018). The researchers have also focused on reforms in federal regulations to increase the number and quality of tools and resources provided to agencies to detect fraud (Olsen, 2014). Fraud reform aids in the implementation of improved internal control policies and procedures (Olsen, 2014).

Business owners and property managers of subsidized properties often are the perpetrators, as well as the victims, of rental housing fraud (McClure et al., 2014). This study provided strategies that business executives of PHAs can implement to detect and report tenant fraud to the HUD OIG. Business owners and property managers have regular contact with tenants for rent collection and maintenance issues (Graves, 2016). PHA staffs typically have contact with tenants on a semiannual or annual basis at the time of eligibility recertification (Olsen, 2014). Regular contact with tenants provides business owners with a greater opportunity to expose fraudulent tenant behavior, such as unreported income and household composition and other illegal acts (Olsen, 2014).

However, business owners were not participants of this study. Business owners might garner information for determining fraudulent acts from the findings of this study and provide strategies on how to safeguard their properties from tenant fraud. Business owners might employ strategies garnered from the study to implement continuous monitoring techniques and critical business and fraud intelligence through data sharing with housing administrators and law enforcement. Reducing rental-housing fraud may increase the revenues of business owners participating in the HCV program.

Implications for Social Change

The results of the study might have an effect on positive social change. Leaders could gain new insight on fraud-reducing fragmentation, duplication, and overlapping of programs, which may result in more federal funds being available for other vital federal government public services. In 2012, the United States started to recover from the recession triggered by the housing market crash of 2008 (Huth, 2014). Following this downturn, housing became one of the most critical, underserved needs of society (Tucker, 2014). According to the National Law Center on Homelessness and Poverty, the U.S. homelessness rate on July 28, 2013, was 1,750,000 (U. S. GAO, 2014). Of this total, 75% were unemployed, and veterans accounted for 40% of the homeless (U. S. GAO, 2014). Ending homelessness among veterans by 2015 was a top priority for the Obama administration (Gerrard, 2015).

Federal government leaders are attempting to decrease homelessness through providing subsidized housing and programs for low-income families (Gerrard, 2015). The foundation of subsidized housing is the Public Housing Program, and more than

3,300 PHAs across the nation provide subsidized rental housing units to very-low income and low-income families (Huth, 2014). However, the HCV program is the most popular subsidized housing program (Ellen, 2018).

The findings might contribute to positive social change because strategies to combat tenant fraud are essential to deter fraudulent criminal activities in rental housing programs. Study findings might also lead to business owners increasing revenues from rental properties. Fraud deterrence might augment the competence and effectiveness of executives administering rental-housing programs and ensure funds remain available to meet the housing needs of poor people. With the continual increase of the deficit, executives must develop and implement effective strategies to reduce waste and abuse in the rental housing market. Based on the findings of the study, leaders could increase their knowledge of strategies that work to detect tenant fraud, lead organizations effectively, and improve policies and programs.

Reducing or eliminating tenant fraud in federally, subsidized housing programs would provide several benefits to society. Fraud elimination would provide an opportunity for the government to fund additional housing programs to aid the homeless and those at imminent risk of becoming homeless (Berk-Clark, 2016; Huth, 2014; Olsen, 2014). The anticipated knowledge to glean from this study may provide business owners, PHA leaders, and the Federal Government with the identification and description of strategies to deter and combat tenant fraud in the HCV program. Findings from this study might substantiate the promotion of leadership models appropriate for promulgating efficient fraud detection and mitigation strategies. Study findings might enable business

owners to reduce business losses, and may lead to federal government leaders realizing

significant cost savings from reducing fraudulent behavior. The findings from this study

could support federal government leaders funding a research project to study rental-

housing fraud that could protect the integrity of government housing programs.

<div align="center">**A Review of the Professional and Academic Literature**</div>

The purpose of this literature review was to provide a framework and

authentication of the foundation of the study for the overreaching research question: What

strategies do business executives and owners use to detect and eliminate tenant fraud in

subsidized rental housing? I researched and reviewed over 600 articles published over a

three-year period and included 395 relevant articles. I substantiated the interrelationship

between the research problem and the context of this study.

Organization of the Review

The literature review begins with an overview of the conceptual framework

steering this study, the theory of planned behavior (TPB), which includes a discussion of

similar studies that relied on the TPB. Next, I provide a historical perspective of

subsidized rental housing in the United States and a depiction of the emergence of

subsidized rental housing fraud. I follow with an overview of the origin of the HCV

program, followed by a discussion on similar subsidized rental housing programs in other

countries. The literature review also includes an investigation of the problem of tenant

fraud and abuse in rental housing, followed by a delineation of HCV program fraudulent

schemes. The review encompasses a brief synopsis of other types of housing fraud and

correlated TPB studies, comprised of financial fraud, mortgage fraud, and real estate

fraud. Based on the TPB conceptual framework of the study, I specify the underlying motivators for individuals committing fraud. Next, I provided an in-depth discussion of the problem of rental housing fraud, followed by an examination of pilot solutions to the problem of rental housing fraud. Included in the review are strategies housing leaders have implemented to combat rental-housing tenant fraud and included a discussion on mitigation efficacy. Finally, I examined the financial impact of HCV program fraud and report on the gaps in research on identifying strategies to mitigate tenant fraud in rental housing.

Strategy for Searching the Literature

The strategy for the literature review consisted of a broad and focused search of various sources such as scholarly journal articles, books, and electronic media across multiple disciplines. Principal sources from search engines on the Walden University Library research databases included Business Source Complete, ABI/INFORM Complete, ProQuest, SAGE Premier, and ScienceDirect. The literature review consisted of a search of the following keywords: *housing programs, rental housing fraud, subsidized housing fraud, tenant fraud, government fraud, government corruption, public housing fraud, HUD programs fraud, federal government fraud and abuse, and the Housing Choice Voucher program.* Other keywords searched included *fraud, mitigating fraud, combating fraud, low-income housing, motivating factors of fraud, profit motivation of fraud, federal government embezzlement, the complexity of HUD regulations, property theft, personal identity, and information theft,* and *the cost of fraud.* The literature review includes 395 references. The publication date for 345 of the 395 articles (87%) was

within 5 years (2014-2018). Two hundred ninety-five of the 345 references (86%) were peer-reviewed articles.

Critical Analysis of the Theory of Planned Behavior

Ajzen developed the theory of planned behavior (TPB) in 1985 from the theory of reasoned action (Ajzen, 2015). The TPB describes how human behaviors are shaped by individual attitudes, belief systems, and intentions (Ajzen, 2015; Ajzen & Sheikh, 2016; Chen, 2016). There is a high correlation between different attitudes and subjective norms to what provokes certain behavioral intentions (Ajzen & Sheikh, 2016; Lortie & Castogiovanni, 2015; Teng et al., 2015). Some researchers contended the TPB is static and should be retired, especially for predicting and changing individual behavior regarding health care (Gagnon et al., 2015; Lortie & Castogiovanni, 2015; Sniehotta, Presseau, & Araújo-Soares, 2014). Another criticism of the TPB is that theorists applying the TPB excluded its cataleptic stimulus on behavior and only focused on rational cognition (Sniehotta et al., 2014).

The likely sustainers are a limitation of the TPB because these individuals expressed intent to perform but failed to carry out an act (Kautonen, van Gelderen, & Fink, 2015; Sniehotta et al., 2014). Defenders of the TPB contended that critics have not substantiated their claim to discredit the TPB and failed to consider the effects of behavior on future behavior (Ajzen, 2014; Gagnon et al., 2015; Sniehotta et al., 2014). Critics of the TPB acknowledged studies have shown a significant change in intentions has resulted in behavioral changes (Ajzen, 2014; Johnson, Siegel, & Crano, 2014; Sniehotta et al., 2014).

There is a dearth of studies exploring strategies to combat tenant fraud in the rental housing market. However, there are numerous studies relating TPB and other types of fraud. The studies reviewed include a correlation to the beliefs, subjective norms, and perceptions of control that influence individuals to commit fraudulent acts.

In an exploratory study conducted in the United Kingdom of 64 cases of bank fraud, researchers used the TPB to study the behavior of the employees and management who had committed financial fraud (Hollow, 2014). In a study of the reparative behavior of 261 participants, researchers used the TPB to investigate the effects of moral emotions of guilt and shame to the level of financial harm (Ghorbani, Liao, Çayköylü, & Chand, 2013). Researchers found that compensation the transgressors provided to the victims affected by their unintentional harmful acts (Ghorbani et al., 2013). Hollow (2014) revealed that the nature of the economic pressures motivating offenders to commit fraud differed by level of position: teller versus management (Hollow, 2014). The researchers of the study on reparative behavior presented guilt and shame as an explanation of why people feel a need to compensate others for their unethical decisions that lead to harm (Ghorbani et al., 2013).

HUD staff conducted a national study on housing discrimination in 2000 using the TPB (Hanlon, 2015; Iglesias & Saylor, 2012; Patterson, 2018). The highest incidence of housing discrimination was toward African Americans and Hispanics (Iglesias & Saylor, 2012). The focus of another study in the United States on the rental housing market using the TPB was on discrimination based on two attributes of statistical discriminators (Ewens, Tomlin, & Wang, 2014). The two attributes were differential treatment of

perceptions based on varied experiences and race that molded opinion (Ewens et al., 2014). The study involved analyzing a sample of 14,000 rental inquiries on rental housing market discrimination (Ewens et al., 2014).

The HUD housing discrimination study results indicated there were an estimated 4 million isolated cases of housing discrimination from 1970 to 2000 (Iglesias & Saylor, 2012). The HUD national study findings indicated that the rate of illegal race and national origin discrimination had remained constant since 1977, with Caucasians favored 25% more than African Americans and Hispanics (Iglesias & Saylor, 2012; Jacobs & Manzi, 2014; Patterson, 2018). The HUD study on housing discrimination showed that local municipalities still engage in housing discrimination indirectly through exclusionary zoning laws (Iglesias & Saylor, 2012). Findings from the study on rental housing market discrimination revealed property owners treated applicants with African-American-sounding names more negatively than they treated renters with Caucasian-sounding names (Ewens et al., 2014).

Reconstruction and Development Programme study. Countering the poor housing conditions left from South Africa's post-apartheid government era, the government developed the Reconstruction and Development Programme (Gathiram, 2014; Lombard & du Preez, 2014). The Reconstruction and Development Programme (RDP) involved constructing quality housing for poor residents in the Eastern Cape of South Africa (Kang'ethe & Manomano, 2014). Researchers of the RDP study used the TPB to evaluate the residents' perceptions of the government's illegal activities in program administration. The qualitative RDP study was an explorative, descriptive study

design of 22 RDP beneficiaries, and 50 participants for a quantitative mini survey (Gathiram, 2014; Lombard & du Preez, 2014).

Many of the RDP study participants alleged the government officials received housing on a fraudulent basis or the officials awarded housing to individuals who later sold the homes (Kang'ethe & Manomano, 2014). In another study on the rental-housing conditions in Accra, Ghana, researchers used the TPB to focus on the Advance Rent System, which was an escalating tenancy management practice (Arku, Luginaah, & Mkandawire, 2012). After interviewing 44 women property owners and tenants in the advance rent system, Arku et al. (2012) revealed the conditions that molded women property owners' behaviors toward tenants. The Advance Rent study encompassed the tenants' responses to fraudulent tenure terms and requirements imposed by the landlords (Arku et al., 2012). Tenant participants expressed feelings of insecurity due to the government's inability to arbitrate tenant and landlord disputes efficiently. Property owner participants claimed that higher rents resulted from tenants' unstable income and irregular payments. Property owners were also concerned with escalating building material costs and interest rates and the lack of available financing (Arku et al., 2012).

The RDP study findings indicated that the government perpetrated corruption, nepotism, and favoritism to award housing to ineligible families (Gathiram, 2014; Kang'ethe & Manomano, 2014; Lombard & du Preez, 2014). The RDP study further revealed 86% of the participants perceived that corruption was high, and 14% perceived it was low (Kang'ethe & Manomano, 2014). Findings from the mini survey portion of the RDP study complemented the qualitative part (Kang'ethe & Manomano, 2014; Lombard

& du Preez, 2014). The RDP study outcomes also revealed the RDP was corrupt and government administrators made it difficult for applicants to access housing objectively (Kang'ethe & Manomano, 2014; Lombard & du Preez, 2014). The participants of the mini survey reported their perception was individuals received preferential treatment only if they bribed the government officials. Findings from the advance rent system study revealed the Ghana rental market was problematic, as evidenced by the tenants' concerns about enduring long-term advance rents in a corrupt system (Arku et al., 2012). Corruption in the Ghana rental market included eviction threats, rental contract breaches, strained tenant and property owner relationships, increasing rental costs, and extensive searches for scarce rental units (Arku et al., 2012).

The RDP study findings revealed 64% of the participants believed nepotism was very high, and 32% believed it was low (Kang'ethe & Manomano, 2014). The Participants felt that applicants related to government officials would move higher on the housing assistance waiting list (Kang'ethe & Manomano, 2014; Lombard & du Preez, 2014). The RDP study included recommendations to the government to initiate a thorough investigation of its administration of the RDP and a zero-tolerance program for eradicating corrupt activities (Kang'ethe & Manomano, 2014). Results from the Advance Rent System study indicated the tenants perceived that greed drove women-owned property holders.

Consequently, the element of desire resulted in a fraudulent scheme to raise and extend the pricing structure long term (Arku et al., 2012). The solutions that evolved from the Advance Rent System included passing new legislation to monitor property

owners' behavior used for enforcement (Arku et al., 2012). An additional

recommendation resulting was to abolish the long-term Advance Rent System and replace

it with monthly rental obligations (Arku et al., 2012).

     Marking scheme for tenancy enforcement in public housing estates. The

theory of planned behavior was the foundation for a study on the marking scheme for

tenancy enforcement in public housing estates (Aparcana & Salhofer, 2013; Li, Chen,

Hui, Yang, & Li, 2014). Hong Kong public administrators launched the marking scheme

project in 2003 as a mechanism to improve the environmental hygiene of public housing

(Li et al., 2014). Officials designed the marking scheme as a penalty-driven system to

track tenant behavior that would warrant eviction as recourse for noncompliance (Li et

al., 2014). The illegal practices included fraud, robbery, theft, burglary, vandalism,

bullying, employment instability, and conflict with parents, heavy drinking, drug use, and

sexual promiscuity (Li et al., 2014). In 2013, researchers for the Dutch government

conducted a study using the TPB on the Dutch rent rebate system, formerly known as the

Dutch housing allowance system (Priemus & Haffner, 2016). The purpose of the Dutch

study was to determine how to eradicate fraud, reduce the poverty cycle, and curtail

intensifying government expenditures (Priemus & Haffner, 2016). Another purpose of

the Dutch study was to combat the overconsumption of housing services of the rent rebate

system (Priemus & Haffner, 2016).

     The marking scheme study encompassed the perceptions of 339 participants living

in two public rental housing (PRH) developments using a preset questionnaire for the

social impact assessments (Aparcana & Salhofer, 2013; Li et al., 2014)**.** The survey had

questions to survey the participants' opinions on the effect of the problems in the

community and influence of the marking scheme on deterring bad behavior (Aparcana &

Salhofer, 2013; Li et al., 2014). The Dutch housing study is similar to this current study,

as tenants have a choice of housing based on income. The focus of both studies is on

reducing fraud in the subsidized rental housing programs.

The Dutch government's budget experienced a massive deficit similar to the U.S.

government's budget deficit, which created an urgency in reducing government spending.

The HCV program, which is the focal point of this proposed study, provides an upfront

rent subsidy, whereas the Dutch subsidized housing program provided a rent rebate after a

tenant paid rent. The goals of the Dutch rent rebate system include (a) serving as a

mechanism for preserving affordable housing, (b) expanding housing options available

for families using the mobility feature, (c) decreasing the high ratio of concentrated lower

income families residing in poorer neighborhoods and encouraging mixed-income

communities, and (d) enhancing the quality of housing (Priemus & Haffner, 2016).

Researchers conducted a study to determine the severity of the marking scheme 94

(Aparcana & Salhofer, 2013; Li et al., 2014). Using a 5-point Likert-type scale in which

1 = *strongly agree* and 5 = *strongly disagree*, the participants expressed their opinion of

the marking scheme in adequately addressing bad tenant behavior resulting in a mean

score of 2.94 (Aparcana & Salhofer, 2013; Li et al., 2014). In addition, 48.1% of the

participants indicated they opposed the use of the marking scheme (Aparcana & Salhofer,

2013; Li et al., 2014). The results of the marking scheme study substantiated the

participants' accusation that the marking scheme undermined the harmony of families

through the fear of eviction and the culture of blame (Aparcana & Salhofer, 2013; Li et al., 2014). The association held entire households responsible for any member's behavior (Aparcana & Salhofer, 2013; Li et al., 2014). The member's belief system directly influenced the member's behavior, as indicative of the TPB (Aparcana & Salhofer, 2013; Li et al., 2014). The researchers concluded the marking scheme was not effective in eradicating bad tenant behavior (Aparcana & Salhofer, 2013; Li et al., 2014).

Findings from the Dutch housing study further indicated using income projections to calculate subsidies might curtail fraud more efficiently because future income is more current and has a higher probability of being correct than historical information does (Priemus & Haffner, 2016). The rent rebate study revealed the system needs revising (Priemus & Haffner, 2016). The use of income projections rather than past income pushed families further into poverty because of the complex regulations (Priemus & Haffner, 2016).

As in the TPB, the attitudes, belief systems, and intentions of the tenants in the marking scheme study influenced their behavior (Ajzen & Sheikh, 2016; Ajzen, 2015; Li et al., 2014). The social impacts of the marking scheme study contradicted findings regarding the marking scheme, which indicated the need for additional research (Aparcana & Salhofer, 2013; Li et al., 2014). Researchers concluded from the rent rebate study that one way to reduce subsidized housing overconsumption is to base the rent rebates on median rent in a particular jurisdiction instead of current leases (Priemus & Haffner, 2016).

Other TPB-focused studies. The goal of a quantitative study, using the TPB, on

governments of different African countries was to assess the correlation between

corruption control and specific exogenous factors (Asongu, 2013). Nigeria has

experienced a significant increase in the volume of employee fraud in the public sector,

and it is has become a way of life for many residents (Abdullahi & Mansor, 2015;

Olufemi, 2013). Although Nigeria is one of the richest countries in the world due to the

crude oil industry, more than 70% of residents live in poverty (Abdullahi & Mansor,

2015; Olufemi, 2013). With 20% of the population receiving 65% of the country's

revenues, the remaining 35% of income goes to 80% of the population (Abdullahi &

Mansor, 2015; Olufemi, 2013).

The panel of participants in the study on corruption in African government

included representatives from 46 countries in Africa during 2002–2010 (Asongu, 2013).

From another study using the TPB, researchers focused on the English local government

that experienced a conflict between a restrictive government with significant ethical laws

and a low-end government with fewer restrictions (Doig, 2014). England has 350 unitary,

county, and district councils and 20,000 elected councilors (John, 2014). The English

local government employs 2 million people, costing $65 billion, and provides a variety of

services costing $168 billion annually (John, 2014). National Fraud Authority leaders in

the United Kingdom projected the total risk of fraud and corruption at more than $2

billion annually within the English local government, including rental housing fraud and

procurement fraud (Doig, 2014).

A study on corruption in African countries concluded that eradicating corruption was the most formidable challenge these African government officials faced (Asongu, 2013). African countries with leaders who established public systems with a higher level of democracy experienced greater success in the fight against corruption (Asongu, 2013). Countries whose leaders were already taking the issues of corruption seriously had strong, enforceable policies in place. The consistent view of the African government study participants was that government should not delay the revision and enforcement of policies on fighting corruption (Asongu, 2013).

The African government study findings indicated that the more affluent an area was, the less corruption there was (Asongu, 2013). Conversely, the African government study outcomes reported that the greater the poverty levels in countries, the higher the level of corruption in those countries (Asongu, 2013). Findings from the English local government study indicated that after the eruption of major fraud scandals that occurred before 1970, the government began implementing additional laws to mitigate fraud (Doig, 2014; Wu & Wu, 2012). Doig (2014) depicted a low-road governing structure as a controlled environment. English local government passed the 2011 Localism Act as a comprehensive reform to the delivery of public services to promote local involvement (Doig, 2014; Wu & Wu, 2012). Thus, the law reduced government bureaucracy and gave more control to more parties (Doig, 2014; Wu & Wu, 2012).

In a Hong Kong study, researchers used the TPB to evaluate the effect of antipoverty on public rental housing, which is one of the largest public welfare programs in Hong Kong (Hu & Chou, 2015). The Hong Kong study encompassed a comparison of

different methods for estimating imputed rents and associated errors (Hu & Chou, 2015).

Three computation methods used to impute rents in the Hong Kong public rental housing

were the self-assessment method, the user cost approach, and the rental equivalence

method (Hu & Chou, 2015). The cash value of government subsidies was equivalent to

the estimated public rental housing rents (Hu & Chou, 2015).

The Hong Kong study findings indicated the choice of the method selected to

impute rents made a significant difference in the measurement of antipoverty on the

public rental housing (Hu & Chou, 2015). Participants' belief system on fraud had

influence on the method chosen to compute rents and associated errors (Hu & Chou,

2015). For those participants who grew up in poverty and believed the government owed

citizens, they selected the self-assessment method (Hu & Chou, 2015). However,

outcomes of the Hong Kong study revealed the rental equivalence method was the most

accurate way to measure the impact of antipoverty on the public rental housing (Hu &

Chou, 2015).

van Onna, van der Geest, Huisman, and Denkers (2014) used the TPB in a study

conducted to identify the trajectory groups of white collar criminals and profile of

characteristics. The white collar criminal study included reviewing 644 –white collar

criminals prosecuted but not convicted between 2008 and 2012 in the Netherlands. Data

came from the Netherlands Internal Revenue Service and Municipal Personal Records,

and van Onna et al. (2014) performed a trajectory analysis. In another study on

government corruption and misconduct, Purcell (2016) used the TPB to evaluate the

behavior of perpetrators listed in 84 local Australian government investigative reports. A

significant limitation of the Australian government corruption study was the results might

reflect an underestimate of offenders because it only included registered offenders

(Purcell, 2016). Another limitation of the study was it did not include cases handled by

the regional or local police or those tried under the administrative or civil law (Purcell,

2016).

The trajectory groups of white collar criminal study results reflected the criminal

career attributes and a sociodemographic synopsis of the perpetrators from age 12 through

adulthood (van Onna, van der Geest, Huisman, & Denkers, 2014). The white-collar

criminal study outcomes revealed that white collar offending is not very reliant upon

situational issues (van Onna et al., 2014). The most prevalent offenses of the participants

were bankruptcy fraud, credit and mortgage fraud, labor fraud, money-laundering fraud,

and fraud related to taxes and customs (van Onna et al., 2014). Offenders had committed

more than one offense with nominal frequency, beginning in their adolescence years (van

Onna et al., 2014). The data used for the white collar criminal study did not include

information about the participants' adolescent years (van Onna et al., 2014). The

researchers purported that the teenage years are a period in a criminal's life that plays a

significant role in the development of criminal tendencies (van Onna et al., 2014).

Findings from the Australian government corruption and misconduct study indicated the

root causes of white collar crime are excitement from taking risks, greed, and exertion of

perceived power (Purcell, 2016). More research is needed to find a broader spectrum to

draw a better conclusion of the behavior of white collar criminals (Li et al., 2016; Michel,

Cochran, & Heide, 2016; Pozzolo, Caelen, Le Borgne, Waterschoot, & Bontempi, 2014;

Roberts, Indermaur, & Spiranovic, 2013; van Onna et al., 2014).

Researchers conducted a management behavior study on fraud using the TPB that

involved examining 39 cases of corporate fraud during 1992–2005 (Cohen, Ding, Lesage,

& Stolowy, 2017). The purpose of the management behavior study was to examine

publicized fraud cases to assess if management behavior might relate to unethical conduct

being the underlying reason people commit fraud (Cohen et al., 2017). Another purpose

of the management behavior study was to explore how current auditing standards

consider management's behavior as a warning sign of unethical behavior (Cohen et al.,

2017).

In a study on the outcome of job performance based on individual employee

perception, theorists used the TPB to study two field samples (Ajzen & Sheikh, 2016;

Ajzen, 2015; Mero, Guidice & Werner, 2014). The purpose of the job performance study

was to determine if the managers' close supervision of employee behavior would enhance

the perception of rationalization (Ajzen & Sheikh, 2016; Ajzen, 2015; Mero et al., 2014).

The focus of the job performance research was to analyze the relationship between

monitoring employee behavior and performance results (Mero et al., 2014). Jacobs and

Manzi (2014) used the fraud triangle theory and the TPB to expound on a qualitative

study that focused on how to best theorize the relationship between individual action and

social framework. Jacobs and Manzi conducted in-depth interviews with 16 people

engaged in benefit fraud.

Study findings from the assessment of whether management behavior might relate to unethical behavior being the underlying reason for fraud, included three explanations: psychological, sociological, and moral development (Cohen et al., 2017). Researchers conducted a quantitative assessment of keywords to validate the keywords related to the perceptions and reasoning factors evident in the firms participating in the management behavior study (Cohen et al., 2017). Based on the findings of the management behavior study, one of the most prevalent fraud risk factors is personality traits (Cohen et al., 2017). Findings from the employee performance behavior study indicated the employees who encountered close supervision had a higher perceived accountability for performance results (Mero et al., 2014). Findings from the study that Jacobs and Manzi (2014) conducted revealed that the staff's attitudes, belief systems, and subjective norms influenced their performance behavior, as they are the basis of the TPB.

In a related study, researchers used the TPB to compare the social condition of the Germany welfare system before and after the 2005 reform (Riphahn, Sander, & Wunder, 2013). In the German welfare system, researchers evaluated the use of the welfare system by Turkish immigrants and natives (Riphahn et al., 2013). The Turkey welfare reform study was the first in which researchers investigated the condition of immigrants (Riphahn et al., 2013). According to the German welfare system study, the post reform Turkish welfare system included both unemployment and social assistance as unemployment benefits. Riphahn, Sander, and Wunder (2013) used data from the German socio-economic panel study to determine what programs and services would work best as determinants of using welfare benefits.

Findings from the Germany welfare system revealed that Turkish immigrants used the welfare system more than natives did (Riphahn et al., 2013). Statistics showed people began using the Turkish welfare system at the age 50–60 years (Riphahn et al., 2013). Post-welfare-system-reform statistics indicated increased use from Turkish immigrants and citizens (Riphahn et al., 2013). Theorists had previously studied welfare fraud from the aspect of noncompliance theories of deterrence, personal morality, and social norms, of showing the correlation of such studied in the TPB (Regev-Messalem, 2013; Regev-Messalem, 2014). One recommendation from the Germ any welfare reform study included training programs for Turkish immigrants (Riphahn et al., 2013). Another proposal included promoting the hiring of older adults in the labor market to deter the use of the German welfare system (Riphahn et al., 2013).

The next section includes a discussion on the historical perspective of subsidized rental housing in the U.S., the origin of rental housing fraud, and the origin of the HCV program, which I have focused on for this study. To expand the perspective of the research problem, I have included a brief discussion on other housing programs in other countries that are similar to the HCV program in the U.S. The literature review encompassed a discussion on examination of the rental housing fraud and abuse problem, HCV fraudulent schemes, along with a brief overview of other types of housing fraud.

Historical Perspective of Subsidized Rental Housing in the U.S.

Congress established public housing through the Housing Act of 1937 (Carder, Luhr, & Kohon, 2016; Graves, 2016; Huth, 2014; Walter & Wang, 2016). The original purpose of public housing was to provide safe, decent, and sanitary housing for the

families of service members and those working in the war industry after World War II

(Eriksen & Ross, 2015; Graves, 2016; Huth, 2014). Public housing had changed

significantly 10 years after World War II ended, with a new focus on providing housing

for very-low-income families and those living in bleak environments (Eriksen & Ross,

2015; Huth, 2014; Walter & Wang, 2016). Theorists believe the passage of the Housing

Act of 1969 had the most prominent effect on the conversion of public housing (Huth,

2014). The legislation established a ceiling of 25% of gross monthly income as the

maximum out-of-pocket housing expense for families (Ellen, 2018; Huth, 2014; Jung et

al., 2014). The Housing Act of 1969 created a shortage in affordable, decent housing

because PHAs did not receive sufficient funding from the federal government to increase

public housing stock and maintain existing units (Jung et al., 2014).

Approximately 7 million federally subsidized housing units were available for

low-income families in 2014 (Carder et al., 2016; Eriksen & Ross, 2015; Walter & Wang,

2016), which is enough housing stock to serve only one-fourth of the eligible families

(Greenlee, 2014). Officials at HUD described affordable housing as housing for which

families pay no more than 30% of their gross monthly income on rent and utilities

(Graves, 2016; Huth, 2014; Jung et al., 2014). Housing rent burden exists for most

families when they pay 50% or more of their gross monthly income in rent and utilities

(Graves, 2016; Huth, 2014; Walter & Wang, 2016). Due to the high demand for

affordable housing, the waiting lists at PHAs are sometimes as long as 8–10 years (Carder

et al., 2016; Ellen, 2018; Eriksen & Ross, 2015; Huth, 2014; Jung et al., 2014; Walter &

Wang, 2016).

Housing marketing behavior is essential to understanding the housing situation. A study on housing market behavior during a 10-year period from 1965 to 1975 differed significantly from what one would anticipate based on demand analyses (Carlton & Ferreira, 1977). Researchers incorporated the TPB in the housing market behavior study to determine if the participants' belief system and attitudes about receiving government assistance influenced their behavior towards how the subsidy calculation and increased participation (Carlton & Ferreira, 1977). Findings from the housing market behavior study reflected the percentage of rent formula did not work as well as the housing gap formula (Carlton & Ferreira, 1977). The percentage-of-rent formula is a calculation to determine a subsidized tenant's portion of rent by multiplying the household's adjusted gross monthly income by 30% (Carder et al., 2016; Eriksen & Ross, 2015; Greenlee, 2014; Öst, 2014). The product represents the maximum amount assisted households can pay out of pocket toward rent and remain in compliance with program regulations (Carder et al., 2016; Eriksen & Ross, 2015; Nordvik, 2015; Öst, 2014). Public housing authority executives calculate the housing gap by subtracting 30% of the household's adjusted gross monthly income from the gross rent (Carder et al., 2016; Nordvik, 2015). The PHA pays the difference, or housing gap, that remains, up to established housing payment standards (Carder et al., 2016; Nordvik, 2015; Öst, 2014).

HUD also conducts evaluative studies to determine the efficacy of programs they initiated. In 1972, HUD officials launched an 11-year study called the Experimental Housing Allowances Program (EHAP), which was one of the largest social experiments embarked upon by the U.S. government (Johnson, 2016; Priemus, Kemp, & Varady,

2010). The researchers incorporated the TPB into the EHAP study, encompassing three experiments that involved observing the behavior of 30,000 households and administrative practices at 12 PHAs (Johnson, 2016; Priemus et al., 2010).

As indicative of the TPB, researchers of the Housing Allowance Demand Experiment focused on the recipients' behavior and if their beliefs and value systems influenced how families used HUD subsidies (Ajzen, 2014; Johnson, 2016; Priemus et al., 2010). Researchers of the Housing Allowance Demand Experiment also studied how variables such as payment levels and housing quality standards influenced behavior of the recipients who participated (Johnson, 2016; Priemus et al., 2010). The EHAP study findings indicated that stricter housing standards decreased participation, but the allowances helped sustain existing housing supply by incentivizing owners to make repairs (Priemus et al., 2010). Researchers of the Housing Allowance Supply Experiment studied the impact of allowances on the housing market and concluded housing subsidies had little influence on prices (Priemus et al., 2010). Researchers of the Administrative Agency Experiment evaluated the administration of housing allowance programs and the costs to deliver the services (Priemus et al., 2010). The Housing Allowance Supply Experiment and the Administrative Agency Experiment are examples of how researchers used the theory of planned behavior to evaluate how participants' beliefs influenced behavior.

The EHAP study served as a historical foundation for the 1982 *Report of the President's Commission on Housing*. The EHAP study included a recommendation that Congress establish a housing allowance (HCV/Section 8) program (Priemus et al., 2010).

Thus, the EHAP study is relevant to my study because researchers of the EHAP study incorporated the TPB to determine if the subjective norms of the participants influenced their behavior towards receiving subsidized housing assistance. I focused on identifying strategies PHA leaders have used to detect and eradicate fraud in the HCV program. The procedures included examining behaviors perpetrators exhibit when committing rental-housing fraud. The 10-year housing study on market behavior is relevant to my study because it served as the foundation for how HUD officials derived the HCV program's housing assistance payment formula using fair market rents.

Residential mobility programs. The TPB was the basis of one study conducted to determine if families viewed a residential mobility program as the only option available to them living in below-poverty urban communities (Ellen, 2018; Oakley, Fraser, & Bazuin, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). The residential mobility study involved exploring the needs of low-income families, deficiencies of current programs and policies, and effective and ineffective strategies (Oakley et al., 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). The residential mobility study encompassed three program studies: The Gautreaux Program, the Moving-to-Work Program, and The Baltimore Thompson Program (Katz, 2015; Oakley et al., 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). Following is a synopsis of each of the three program studies

The Gautreaux Program. In a study that involved evaluating the Gautreaux program, researchers used the TPB to conduct semistructured interviews with members of poverty-stricken families who had received housing counseling and assistance from the

program (Katz, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). Researchers collected data on family profiles from the previous 15–20 years (Katz, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). Researchers' goal was to use the TPB to determine if families who had relocated from poverty-stricken urban neighborhoods were still living in the affluent, safer, more integrated communities (Katz, 2015; Quillian, 2012; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). Researchers extended the Gautreaux program study to incorporate participants' children to determine if they later lived in affluent communities as adults (Katz, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). The implication for using the TPB was that the tenants felt that government subsidies should only entitle them to live in poverty-stricken areas.

The Gautereaux Program study findings indicated Caucasians discriminated against African Americans and poor people, which resulted in the segregation of African American families in urban areas where high volumes of subsidized housing existed (Katz, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). The alleged intent was that Caucasians believed they were superior to African Americans, which motivated them to isolate African American families in Chicago from the rest of the city (Katz, 2015; Samuels, 2017; Sanchez, 2015; Sharkey, 2016). Three kinds of segregation substantiated the expanded view of the increasing level of poverty among families living in subsidized housing in urban Chicago (Quillian, 2012). Racial discrimination, poverty-status segregation within a race, and segregation between African Americans and middle-income members of other ethnic groups were the three kinds of segregation prevalent (Quillian, 2012). The Gautreaux program study findings indicated a strong predictor of

where families lived over a decade later was the diversity of neighborhood locations for

families who moved with the Gautreaux program (Katz, 2015; Quillian, 2012; Samuels,

2017; Sanchez, 2015; Sharkey, 2016). A limitation of the Gautreaux program study was

the absence of a control group for the Gautreaux program because the design of the study

was not experimental (Katz, 2015; Sanchez, 2015; Samuels, 2017; Sharkey, 2016).

　　　　Moving-to-Work Program. The Moving-to-Work program study consisted of

636 families, of whom HUD researchers provided 252 families with low-poverty

vouchers, and 50% of the 252 families leased units in non-poverty-stricken

neighborhoods (Ellen, 2018; Oakley et al., 2015; Sharkey, 2016). Researchers of the

Moving-to-Work Program study used the TPB to conduct semistructured interviews and

evaluation of program data. Moving-to-Work Program research findings revealed 80% of

the poverty-stricken families relocated involuntarily, based on their attitude towards the

quality of the neighborhoods (Ellen, 2018; Oakley et al., 2015; Sharkey, 2016). From an

evaluation of crime data, researchers concluded that the most likely cause of residential

instability is the residents' attitudes toward living in dilapidated housing, unreasonable

policy inducements, negligent property owners, and a high crime rate in the community

(Ellen, 2018; Oakley et al., 2015; Samuels, 2017). Researchers at HUD neglected to

provide relevant information on the Baltimore Thompson Program study in the research I

found. If the researcher of the Baltimore Thompson Program study had studied additional

programs, the scope of the findings might have been different.

Origin of Subsidized Rental Housing Fraud

Individuals committing fraud intentionally distort the truth and withhold a material fact for personal gain or profit (Abdullahi & Mansor, 2015; Hollow, 2014; Sandhu, 2016). Individuals committing fraud have the predisposition to do something dishonest, evil, or wrong (Abdullahi & Mansor, 2015; Hollow, 2014; Sandhu, 2016). Federal government officials have focused their attention on the epidemic of housing fraud, waste, and abuse that has been escalating for decades (Anacker, 2014; Ellen, 2018; McClure et al., 2014; Walter & Wang, 2016). Bribery scandals were prevalent during the 1970s, while defense industry scandals dominated the 1980s and accounting scandals led the way in fraudulent schemes in the 1990s and early 2000s (Steinbauer, Renn, Taylor, & Njoroge, 2014). Theorists purported that U.S. sentencing guidelines motivated employer to implement compliance policies (Steinbauer et al., 2014).

Housing discrimination. Although Congress abolished housing discrimination by municipalities in 1917, private owners continued to discriminate through restrictive covenants against their neighbors and others in the rent and sale of housing (Hanlon, 2015; Iglesias & Saylor, 2012; Massey, 2015). The government has continued to work on strengthening fair housing laws through the passage of legislation such as the 1968 Fair Housing Act, the Fair Housing Amendments Act of 1988, and subsequent revisions (Goetz, 2015; Hanlon, 2015; Iglesias & Saylor, 2012; Massey, 2015). Federal government officials reported that race and ethnicity accounted for approximately 50% of the reported rental housing discrimination cases in 2013 (Ewens et al., 2014; Goetz, 2015; Patterson, 2018). According to the 2010 U.S. Census, there is a mixed report on

the progress the government has made in the area of housing discrimination (Goetz, 2015; Greenlee, 2014; Hanlon, 2015; Iglesias & Saylor, 2012; Jacobs & Manzi, 2014).

Rent stabilized apartments. Although the U.S. government abolished the rent control regulation after World War II ended in 1947, New York legislators opted to retain the law (Fisher, 2015; LaMort, 2015; Teresa, 2015). The goal of combating the shortage of affordable housing in the state was the motivating factor for retaining the rent control law (Fisher, 2015; LaMort, 2015; Teresa, 2015). Theorists purported fraudulent individual apartment improvements (IAIs) were one of the biggest challenges facing the rent stabilization program in New York City (Fisher, 2015; LaMort, 2015; Teresa, 2015). Theorists believe this because the program did not require preapproval from the government to qualify for rent increases or any proof of cost reasonableness (Fisher, 2015; LaMort, 2015; Teresa, 2015). The rent stabilization program affected millions of middle- and working-class tenants (Fisher, 2015; LaMort, 2015; Teresa, 2015). The courts reconciled the conflicting messages from the legislature in handling rent overcharges with a focus on unsupervised IAI fraud (Fisher, 2015; LaMort, 2015; Teresa, 2015).

The results of the New York rent stabilization study did not sufficiently substantiate the allegation that property owners committed IAI fraud (Fisher, 2015; LaMort, 2015; Teresa, 2015). Forty-five percent of the sampled population included apartments in which landlords had imposed an illegal rent increase, which LaMort (2015) purported was due to fraudulent IAI activities**.** Tenants were victorious in a $5.5 million lawsuit awarded from overcharges of rents, interest, and penalties of the 1,407 units

sampled (Fisher, 2015; LaMort, 2015; Teresa, 2015). Another study revealed that of

1,100 landlord files audited, 40% of the cases were missing adequate documentation of

the IAIs that landlords had used to garner rent increases for units (LaMort, 2015).

Rachman, a property owner accused of unlawful evictions, forced tenants to move

out of the subsidized units so he could rent the units to high-end clients for prostitution

activities (LaMort, 2015; Simonds, 2002; Teresa, 2015). The prime minister of the

United Kingdom faced accusations of associating with prostitutes during his 13-year

reign in office (Nelken, 2013; Simonds, 2002). Assignations took place in Rachman's

rental properties and created a scandal. Tenant groups disclosed serious incidents of

harassment by Rachman of unlawful evictions (Nelken, 2013; Simonds, 2002). New

York legislators passed the 1965 Rent Act after the Rachman scandal (Nelken, 2013;

Simonds, 2002). The study on the 965 Rent Act had an international influence on some

of the landlord–tenant laws in the United States (Nelken, 2013; Simonds, 2002).

The Rachman scandal prompted the passage of the Tenant Protection from

Eviction Act of 1964. The Tenant Protection from Eviction Act of 1964 made it illegal to

evict a tenant without a court order (Nelken, 2013; Simonds, 2002). Part III of the Rent

Act of 1965 later replaced this law, which established the offenses of harassment and

illegal eviction (Nelken, 2013; Simonds, 2002). Lawmakers then consolidated these laws

into the 1977 Protection from Evictions Act (Nelken, 2013; Simonds, 2002).

Implications from LaMort's (2015) rent stabilization study indicated New York is

losing affordable housing through IAI fraud. The 4-year statute of limitation precludes a

tenant or government from bringing charges against a landlord for fraud (Hansen,

Bourgois, & Drucker, 2014; LaMort, 2015; Nelken, 2013). Several changes in the New

York rent stabilization program would enhance transparency, provide an increased

awareness of the law, and deter theft of affordable housing (Hansen et al., 2014; LaMort,

2015; Nelken, 2013; Simonds, 2002). One fundamental change is to elevate fraud cases

to the Office of the Attorney General if the government agency charged with enforcement

of the rent stabilization law fails to enforce the law (Hansen et al., 2014; LaMort, 2015).

Lawmakers implemented another change in the law that allowed the legislators to repeal

the 4-year statute of limitation and replace it with a 6-year statute of limitation. This

change in law coincided with what they granted landlords for the collection of rents

(LaMort, 2015; Nelken, 2013; Simonds, 2002).

Origin of the HCV Program

The largest and most popular federally subsidized rental-housing program is the

HCV program (Carder et al., 2016; Eriksen & Ross, 2015; Greenlee, 2014; McClure et

al., 2014; Walter & Wang, 2016). Officials at HUD initially named the HCV program the

Section 8 Program because the federal government established it from Section VIII of the

Housing Act (Carder et al., 2016; Ellen, 2018; Greenlee, 2014; Huth, 2014; Walter &

Wang, 2016). The primary purpose of establishing the HCV program was to create

equitable access to affordable open-market units for low-income families who

experienced challenges obtaining housing (Carder et al., 2016; Eriksen & Ross, 2015;

Greenlee, 2014; Jung et al., 2014; Walter & Wang, 2016).

Other purposes of the HCV program are to provide choices to families regarding

where they desire to live, promote mixed-income neighborhoods, and decrease

concentrated poverty-stricken communities (Carder et al., 2016; Ellen, 2018; Eriksen &

Ross, 2015; Jung et al., 2014; Walter & Wang, 2016). The mobility feature of the HCV

program provides families with opportunities to live in neighborhoods zoned for schools

of choice and to live closer to employment (Eriksen & Ross, 2015; HUD, 2001; McClure

et al., 2014; Walter & Wang, 2016). The federal government also subsidizes project-

based units owned by private owners, where HUD officials control rental rates (Carder et

al., 2016; Eriksen & Ross, 2015; Walter & Wang, 2016).

Congress has made HUD officials responsible for determining and publishing

housing data. Published data include median income adjusted for household size, for

every metropolitan area in the United States (Carder et al., 2016; Ellen, 2018; Eriksen &

Ross, 2015; Jung et al., 2014; McClure et al., 2014; Walter & Wang, 2016). Total annual

household income of eligible HCV families cannot exceed 50% of the area median

income, adjusted for family size (Carder et al., 2016; Eriksen & Ross, 2015; Jung et al.,

2014; Walter & Wang, 2016). HUD is also responsible for determining housing vouchers

and subsidies (Carder et al., 2016; Eriksen & Ross, 2015; Jung et al., 2014).

The government subsidizes rent in the form of a voucher (Ellen, 2018; Eriksen &

Ross, 2015; Jung et al., 2014; Walter & Wang, 2016). An HCV subsidy is the difference

between the rent, which is not to exceed fair market rent of a market rate unit, and 30% of

a family's adjusted gross monthly income (Carder et al., 2016; Eriksen & Ross, 2015;

Greenlee, 2014; Jung et al., 2014; Kleit, Kang, & Scally, 2015). The voucher amount

cannot exceed an HUD-defined payment standard (Carder et al., 2016; Eriksen & Ross,

2015; Greenlee, 2014; Jung et al., 2014). To compute adjusted annual income, housing

officials reduce annual gross income by $480 per minor dependent or disabled adult

(Carder et al., 2016; McClure et al., 2014; Walter & Wang, 2016). If a family has

extremely low adjusted annual income, at or below zero (a negative figure), then the

federal government will subsidize the family's utilities (Carder et al., 2016; HUD, 2001;

Jung et al., 2014).

HUD sets the classification of income levels. Officials at HUD describe very-low

income families as those with incomes at or below 30% of the area median income

(Carder et al., 2016; Ellen, 2018; Eriksen & Ross, 2015; Greenlee, 2014; Jung et al.,

2014). Although HUD leaders mandate that PHA management allocate at least 75% of

its HCV program vouchers to very-low-income families, the demand for affordable

housing assistance far outweighs the housing supply (Carder et al., 2016; Ellen, 2018;

Greenlee, 2014; Jung et al., 2014). Several factors influence the challenges families face

in obtaining affordable housing that creates a high demand for housing: homelessness,

domestic violence, extreme poverty, high rent burden, and families residing in doubled-

up living conditions (Carder et al., 2016; Ellen, 2018; Eriksen & Ross, 2015; Jung et al.,

2014). According to the *Annual Homelessness Assessment Report,* in January 2014, there

were 578,424 homeless people on any given night in the United States (Henry, Cortes,

Shivji, Buck, Khadduri, & Culhane, 2014). Of this total, 23% were under the age of 18

(Henry et al., 2014).

Subsidized Rental Housing Programs Similar to the HCV Program

There have been several studies regarding subsidized rental housing programs in

other countries that are similar to the HCV program (Carder et al., 2016; Ellen, 2018;

Eriksen & Ross, 2015; Greenlee, 2014; Jacobs & Manzi, 2014; Nordvik, 2015). The Norwegian government subsidized 70% of a subsidized family's rent, providing the rent did not exceed an established ceiling (Nordvik, 2015). In another study, using the TPB, Schnare and Struyk (1976) tested the hypothesis that the filtering process of housing markets related to price and structural design selected by participants. The data set of comfortable single-family homes in Boston indicated prices were significantly different by the features of the homes (Schnare & Struyk, 1976).

Based on the findings of a Norwegian study on housing benefits, Nordvik (2015) used the TPB to conclude that housing allowances increased the opportunities for mobility for assisted families. The findings from the filtering process of Schnare and Struyk's (1976) housing study indicated there were minor disparities between the prices. The conclusion was the market was operating equitably regarding participants' reactions to price premiums, at least in the market used in the study (Schnare & Struyk, 1976). In contrast, in a study conducted with a representative data set of housing in Australia, Helbich, Brunauer, Hagenauer, and Leitner (2013) concluded that location is the most critical component for establishing the price of housing.

Chile's rental subsidy program. In January 2014, Chile was the first country in South America to adopt a national rental subsidy program (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014). Similar to the HCV program in the United States, this program provided housing assistance to very-low income, young families (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014). Chile's rental subsidy program included a flat rent rate structure with time limits for assistance. This structure provided housing executives a

simple program to administer and higher flexibility for recipients. Government leaders in

Chile and South America focused more support toward homeownership programs before

the subsidized rental program (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014).

More than 50% of Chile's population could not afford home ownership before the rental

subsidy program (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014).

Housing executives in the United States might use Chile's rental assistance

program as a model for U.S. housing subsidy programs, such as the HCV program

(Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014). However, Chile has a different

demographic than the majority of the countries in South America. Chile's per capita

income of $14,000 was the largest per capita income in South America in 2013, and Chile

had the lowest poverty rate (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014).

Demographic statistics influenced the conclusions drawn from the Chile housing

study results. The majority of the subsidized housing programs in South America have

been unsuccessful in attempts to eradicate housing shortages (Comerio, 2014; Gilbert,

2014; Ross & Pelletiere, 2014). The Columbian government launched an unprecedented

housing program in 2012 that provided 100,000 free homes annually to low-income

families (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014). A housing study

conducted in 2014 on the Columbian government program reported government officials

exacerbated the problems facing blighted neighborhoods (Comerio, 2014; Gilbert, 2014;

Ross & Pelletiere, 2014). Poorly constructed homes and the political motivation behind

the program were the reasons for increasing housing problems in Columbia (Comerio,

2014; Gilbert, 2014; Ross & Pelletiere, 2014). Providing free homes did not address the

root of the problem of poverty, which is low-paying jobs (Comerio, 2014; Gilbert, 2014; Ross & Pelletiere, 2014).

Russia's rental housing subsidy program. In 1957, the Soviet president pledged that everyone would have a separate apartment to live in (Lux & Sunega, 2014; Stephens, 2014). This commitment led to the launch of the largest subsidized housing program in history (Lux & Sunega, 2014; Stephens, 2014; Stephens, Lux, & Sunega, 2015). When the Soviet Union collapsed, 25% of Soviet families did not have separate apartments (Lux & Sunega, 2014; Stephens, 2014; Stephens et al., 2015). The second social housing program included providing baby vouchers to any woman who gave birth to a second child (Stephens, 2014). The residents were resistant to the baby vouchers program (Stephens, 2014). In the 1990s, the Soviet Union adopted the same mortgage subsidy products approved in the United States (Stephens, 2014; Stephens et al., 2015). However, the mortgage subsidy program failed in Russia (Stephens, 2014; Stephens et al., 2015). In a qualitative study, using the TPB, of 130 young women who had a strong resistance to mortgage debt, the participants viewed the mortgage product as a type of debt bondage (Stephens, 2014; Stephens et al., 2015). The common outcome of mortgage subsidy studies was that participants thought mortgages resembled public housing and did not constitute ownership (Stephens, 2014; Stephens et al., 2015).

Investigation of the Problem of Rental Housing Fraud and Abuse

The start of the 21st century included an escalating supply of moral meltdowns in both the for-profit and the nonprofit arena (Mian & Sufi, 2017; Seicshnaydre, 2016). Federal government officials have focused their attention on the epidemic of housing

fraud, waste, and abuse that has been escalating for decades (Anacker, 2014; McClure et al., 2014; Seicshnaydre, 2016). The media has reported scandals stemming from PHA employees, tenants, and property owners that have cost taxpayers billions of dollars annually (Anacker, 2014; McClure et al., 2014; Seicshnaydre, 2016). Anacker (2014) discussed seven of the largest HUD scandals that occurred from the 1950s to the 1980s. Fraud detection strategies should be able to identify expediently any fraudulent activities that elude preventive measures (Liu, Wright, & Wu, 2015; Tan, Chapple, & Walsh, 2015; Teplitsky & Harris, 2015).

Executives at HUD OPDR conducted the *Quality Control for Rental Assistance (QCRA)* study in 2001 using the fraud triangle theory (HUD, 2001). Researchers of the quantitative QCRA study revealed that 60% of rent calculations contained some rent, administrative, or component error (HUD, 2001). Public housing authority staff failed to report the earnings of 7% of the employment of households with nonelderly nondisabled heads of household (HUD, 2001). Officials at HUD indicated that 30% of the employee fraud committed was in collaboration with tenant fraud in the HCV program (HUD, 2001). The officials did not design the study to detect and report tenant fraud, which is the intent of my study. However, the QCRA study is relevant to my study because employee fraud contributes to fraud committed in subsidized rental housing programs.

Through the Improper Payments Information Act of 2002, U.S. federal government officials mandated that if any improper subsidy payments exceeded $10 million, then HUD officials must report on resulting actions (HUD, 2012; Olsen, 2014). Government officials also required HUD officials to include the causes of improper

payments, corrective steps were taken, and the result of actions taken (HUD, 2012; Olsen, 2014). Government officials required HUD staff to report if they had the systems and infrastructure in place to reduce improper payments (Olsen, 2014). Public officials also required HUD personnel to present the steps taken to ensure HUD officials held PHA executives accountable (Olsen, 2014). In 2003, OPDR staff engaged in a study to measure HUD's progress in reducing the number and dollar amounts of rent calculation errors experienced in 2003 (McClure et al., 2014). The qualitative study using the TPB included interviews and data collected from 2,700 households at 600 sites (McClure et al., 2014). HUD officials used purposeful sampling to identify participants for the improper payments study (McClure et al., 2014). The GAO officials reported PHA staff made improper payments of over $2.3 billion during the research subject year (McClure et al., 2014).

HCV Program Fraudulent Schemes

HCV program fraud is a type of white collar crime (HUD, 2012). Financial white collar crime and fraud have existed since the beginning of commerce and trading (Doig, 2018; Piquero, Piquero, & Weisburd, 2016; van Onna et al., 2014). Although Sutherland coined the term white collar crime in 1939 as crimes committed by individuals of high social status, theorists have continued to disagree on its definition (Doig, 2018; Michel et al., 2016; Pontell & Geis, 2014; Simpson, 2013). Scholars have conducted and published research studies inclusive of theories that are distinguished fraud crimes from other white collar financial crimes, burglary, and theft (Cohen et al., 2017; Koester & McVay, 2017; Michel et al., 2016). Theorists have continued to debate the types of offenses,

characteristics of offenders, context the crimes are committed to, and government

responses that comprise white collar crime (Bartov & Faurel, 2016; Doig, 2014; Doig,

2018; Free & Murphy, 2015; Michel et al., 2016; Simpson, 2013). Sutherland's original

definition of white collar crime did not distinguish violent consequences from economic

ones (Fijwala, Palasinski, & Shortland, 2014; Michel et al., 2016; Simpson, 2013).

Although white collar crime is more costly and physically harmful to society than

street crime, the penalties are typically less severe than street crime (Free & Murphy,

2015; Hussain & Manzoor, 2014; Michel et al., 2016). The estimated cost of white collar

crimes is $200 billion to $600 billion annually (Hussain & Manzoor, 2014). Traditional

property crimes such as theft and burglary cost the public $18 billion annually (Michel et

al., 2016). Most studies conducted on white collar crime have failed to include a valid

measurement of lay knowledge about this type of crime (Michel et al., 2016). In a study

of public knowledge about the magnitude of white collar crime, Michel, Cochran, and

Heide (2016) selected 408 participants to complete online questionnaires. The study

findings indicated that participants did not understand white collar crime (Michel et al.,

2016).

During the 1980s, theorists expanded and grouped white collar offenders into

three groups: crisis responders, opportunity takers, and stereotypical criminals (Engdahl,

2015; Michel et al., 2016; van Onna & Denkers, 2018; Piquero et al, 2016). Engdahl

(2015) posited that crisis responders commit crimes because of a perceived crisis.

Theorists have indicated opportunity offenders live monotonous lives and search for

nontraditional opportunities to commit crimes (Michel et al., 2016; van Onna & Denkers,

2018; Piquero et al., 2016). Stereotypical offenders are career criminals who live unstable lives and have low self-discipline, and follow the methodology of the TPB (Lortie & Castogiovanni, 2015; van Onna & Denkers, 2018; Piquero et al., 2016). Business literature includes anecdotal stories and examples of corporate fraud (Li et al., 2016; van Onna & Denkers, 2018; van Onna et al., 2014; Piquero et al., 2016). Rental housing fraud and abuse mirror the many forms of corporate fraud (Ellen, 2018; Greenlee, 2014; Seicshnaydre, 2016).

Nondisclosure of income, household composition, property, or capital, and no declaration of nondependents are key indicators of rental housing fraud (Ellen, 2018; Olsen, 2014). Officials at HUD and OIG identified many cases of rental housing fraud and abuse (Greenlee, 2014; McClure et al., 2014; Seicshnaydre, 2016). The major types of fraud committed in the HCV program include unreported income, unreported or inaccurate household composition, and individuals with criminal backgrounds (Ellen, 2018; McClure et al., 2014). The primary type of fraud that property owners commit is the receipt of income for properties that do not exist (Greenlee, 2014; McClure et al., 2014; Olsen, 2014). Due to staff errors, PHA officials make subsidy overpayments that have a significant financial impact on the HCV program (Ellen, 2018; Greenlee, 2014; Seicshnaydre, 2016).

Since HUD officials developed a baseline error measurement in 2000 to include three primary types of rental housing assistance payment errors, agency officials have commissioned 12 studies (HUD, 2013). The studies included a focus on three types of housing assistance payment errors: (a) staff income and rent determination error, (b)

housing assistance calculation errors, and (c) fraudulent reporting of tenant income

(HUD, 2013). What follows is a discussion of the findings from 12 studies HUD officials

commissioned that incorporated the fraud triangle theory and the TPB to research fraud.

Staff income and rent determination errors. Executives at HUD commissioned

the *HUD Quality Control for Rental Assistance Subsidy Determinations (QCRASD)*

Study of its largest housing programs administered by PHAs in the United States and

Puerto Rico: the HCV program (HUD, 2012; HUD, 2013). The objective of the

QCRASD study was to evaluate and provide national estimates for the magnitude of costs

(HUD, 2013). Officials at HUD also designed the QCRASD study to determine the

causes of PHA employee errors in determining rental housing assistance payments for

subsidized rental housing programs (HUD, 2013).

Researchers of the QCRASD study collected data from December 2013 through

April 2014 from 2,402 participant files from 600 developments of four program types

(HUD, 2012, 2013). The four program categories were public housing programs, PHA-

administered and owner-administered HCV programs, and Section 202 Project Rental

Assistance (HUD, 2012, 2013).

The HUD QCRASD study findings indicated PHA staff computed the correct

amount of rent for 78% of the case participants, and 22% of the cases contained errors

that exceeded $5.00 (HUD, 2013). The aggregate dollar error of the sample equated to

tenant underpayment of rent by $347.6 million (subsidy overpayment) and $260.3 million

tenant overpayment (subsidy underpayment). The net tenant underpayment of rent

(subsidy overpayment) was $87.3 million (HUD, 2013). The HCV program's net aggregate error equated to 23% of the HCV population sampled (HUD, 2013).

Housing assistance payment calculation errors. In comparison to the HUD (2001) study conducted in 2000, the PHAs in the 2013 HUD study population reduced subsidy overpayment errors by 70% ($700,000) (HUD, 2013). The most common mistakes made were transcription and consistency errors (HUD, 2013). The 2013 HUD study findings revealed the most significant errors researchers found in the study were the use of incorrect income and allowance amounts (HUD, 2013). Ten percent of the 2013 HUD study sample was ineligible for the program, and 15% had received approval for the incorrect bedroom-size unit (HUD, 2013).

Fraudulent reporting of tenant income. In their continual quest to combat rental subsidy fraud, HUD officials developed the Upfront Income Verification (UIV) system in 2004 (French & Ruiz, 2011; HUD, 2013). The UIV system serves as a central repository of information on the income and benefits data of housing program recipients (French & Ruiz, 2011; HUD, 2013). HUD executives later changed the name of the UIV system to the Enterprise Income Verification (EIV) system (McClure et al., 2014). The EIV system contains third-party income source and employment information for minors and adults from the Social Security Administration, Social Security Supplemental Income, employment, unemployment, and other sources of household income (French & Ruiz, 2011; HUD, 2013; U. S. GAO, 2014). Leaders at HUD entered into computer matching agreements with the aforementioned third-party sources with the primary goal

of ensuring agencies disbursed the correct amount of subsidies for eligible families (French & Ruiz, 2011; HUD, 2013).

Executives at HUD launched an income match study in 2011 (HUD, 2012; HUD, 2013; U. S. GAO, 2014). The purpose of the income match study was to provide an evaluation of how well the EIV system was working to detect fraud by tenants who had reported inaccurate income information (HUD, 2012; HUD, 2013; U. S. GAO, 2014). The income match study involved matching sources of revenue reported to the National Directory of New Hires and the quality control income data collected from third-party sources (HUD, 2012; HUD, 2013; U. S. GAO, 2014). Data were from 2,404 participants from 1,090 households of four program types (HUD, 2012; HUD, 2013; U. S. GAO, 2014). The four program types were public housing program, PHA-administered and owner-administered HCV programs, and Section 202 Project Rental Assistance Contract (HUD, 2012; HUD, 2013; U. S. GAO, 2014).

The income match study findings revealed tenant fraud of intentional unreported income resulted in an estimated $429 million in overpayments extrapolated nationally of the total $428 billion paid in subsidies (HUD, 2012; HUD, 2013; U. S. GAO, 2014). When extrapolated across the entire population of subsidized households, total tenant fraud equated to 137,000 households with $2 billion of unreported income, resulting in $429 million of subsidy overpayments (HUD, 2012; HUD, 2013; U. S. GAO, 2014). The extrapolated results for HCV program tenant fraud equated to 74,000 households with $1.2 billion of unreported income, which resulted in $266 million of subsidy overpayments (HUD, 2012; HUD, 2013; U. S. GAO, 2014). In a study classifying

specific factors to develop a risk assessment instrument to augment the EIV system, 94%

of the surveyed PHAs seldom prosecuted tenants committing fraud (Green, 2015). The

EIV supplement study findings, using the TPB, showed employee perceptions indicated

that more than 65% of tenants report fraudulent income because of their belief that only

income-eligible individuals should receive assistance (Green, 2015). With the

anticipation of saving the government millions of dollars in subsidy overpayment, Green

(2015) developed a Tenant Accountability Instrument.

Other Types of Housing Fraud

Fraud is a phenomenon that costs taxpayers billions of dollars (Ellen, 2018; Kim

& Maroulis, 2018; Seicsnaydre, 2016; U. S. GAO, 2014). Many organizational leaders

are not able to detect and mitigate fraudulent schemes (Ellen, 2018; Seicsnaydre, 2016;

U. S. GAO, 2014). During the 1990s, theorists began to categorize white collar criminals

into three expanded groups: low-rate, medium-rate, and high-rate offenders (Ellen, 2018;

Michel et al., 2016; van Onna et al., 2014). There are many cases regarding financial,

mortgage, real estate, credit card, identity theft, security, and securities fraud (Mian &

Sufi, 2017; Pozzolo et al., 2014; Roberts et al., 2013). Real estate fraud includes rental-

housing fraud, home equity fraud, foreclosure bailouts, and swindles involving home

renovations and deceptive timeshares (Liou, 2013; Schneider, 2015; Weber, 2015).

Property flipping and using two sets of settlement statements are examples of real estate

schemes (Weber, 2015). Property flipping involves a buyer paying a low price for a

house and then reselling it for a highly inflated price, which usually involves two sets of

settlement statements (Liou, 2013; Schneider, 2015; Weber, 2015).

Financial fraud. Financial fraud refers to using financial transactions to deceive others intentionally for personal gain (Lichtenberg, Stickney, & Paulson, 2013; Mayer, Cava, & Baird, 2014; Shore, 2018; Williams, 2013). Officials of the National Center on Elder Abuse categorize financial fraud against older adults as financial abuse, which is one of the five classifications of elder abuse (Li et al., 2016; Lichtenberg et al., 2013). Corporate fraud has been on a steady rise, with financial fraud being the highest ranking (Cohen et al., 2017; Doig, 2018; Soltani, 2014; Williams, 2013).

The population of older adults age 60 and older in China grew from 9.2% in 1990 to 11.7% in 2013 and is likely to increase to 21.1% by 2050 (Li et al., 2016). On the other hand, citizens aged 65 and older represented 13% in 2011 and are likely to increase to 19% in 2021 and 26% in 2041(Li et al., 2016). The growth in this segment of the population has increased the government's concern for older adults becoming victims of fraud (Federal Bureau of Investigation [FBI], 2013; James, Boyle, & Bennett, 2014). The elderly Chinese population appears to be more trusting and susceptible to fraudulent acts against them (Lichtenberg et al., 2013).

Researchers used the TPB to conduct a qualitative study in Hong Kong to explore financial fraud of nonfamily members against elderly Chinese citizens (Li et al., 2016). Study participants included 45 stakeholders, via six focus groups (23 males and 22 females), who served in roles to aid the elderly. These roles included police officers, nurses, bank employees, caregivers, residents of the community, and social workers (Li et al., 2016). The victims studied in the Hong Kong study included socially inactive elderly individuals with little family support, in declining health, who kept cash at home (Li et

al., 2016). Other victims included seniors with greedy personalities, individuals with

children who were not aware of their privacy rights, and religious individuals (Li et al.,

2016). Most of the Hong Kong study victims held to traditional Chinese norms and

ideologies (Li et al., 2016). Some of these ideologies include the saving-face ideology

(embarrassed to report) and mutual support and kinship [others are supposed to help the

elderly] (Li et al., 2016).

The Hong Kong study findings revealed the perpetrators were males and females

from diverse backgrounds (Li et al., 2016). The elements of the TPB included in the

Hong Kong study were the perpetrators' belief system, based on their diverse

upbringings, which correlated to their attitudes toward committing fraudulent acts. Study

outcomes indicated perpetrators used deceptive schemes, such as pretending to be a

family member or caring friend over the phone, dishonest salespeople, and enthusiastic

people offering to assist (Li et al., 2016). The findings from the Hong Kong study on

older adults indicated that financial fraud requires a motivated and competent offender

(Li et al., 2016). Another indication from the Hong Kong elderly study was that targeting

older adults is contingent upon the demographics of the victims revealed from prior

studies (Li et al., 2016). The third conclusion of the elderly study was that fraudulent

activity does not require face-to-face contact (Li et al., 2016).

Other studies conducted on the level of fraud committed against the elderly have

yielded conflicting results (James et al., 2014; Lichtenberg et al., 2013; Ross, Grossmann,

& Schryer, 2014). The findings from Ross et al.'s (2014) study revealed elderly victims

were typically well educated, were wealthy, and had a large circle of family and friends.

In the study, Ross et al. (2014) indicated middle-income individuals age 75 and older, living alone, a significant number of medications, and a small network of family and friends, were the typical victims of financial fraud. Another study conducted in the Netherlands reported elderly men living alone and individuals suffering from depression were the typical profile of fraud victims (Li et al., 2016). The findings from another study by James, Boyle, and Bennett (2014) that included 639 elderly participants who had no trace of dementia indicated the susceptibility to fraud against the elderly is high, regardless of financial status or level of literacy.

Recommendations generated from the Hong Kong study included (a) strengthening the level of elderly guardianship, (b) authorities should apply greater restraint over offenders, (c) banks should have more counters to accommodate the elderly to reduce the digital divide, and (d) law enforcement and others serving older adults should inform them of evolving fraud techniques (Li et al., 2016). The limitations of the Hong Kong study included the small sample size ($n = 45$) and a scope limited to just financial fraud (Li et al., 2016). Another limitation of the study was that secondary contacts committed the majority of the criminal acts, with little mention of fraudulent acts by primary contacts of the elderly (Li et al., 2016).

Mortgage fraud. Mortgage fraud is the intent of an applicant or other interested party to misstate, misrepresent, or omit relevant information used by a lender or underwriter for loan funding decision-making (Cochran & Shelnutt, 2014; McCarthy, 2014; Stowell, Pacini, Schmidt, & Keller, 2014). Mortgage fraud was one of the fastest growing white collar crimes in the 1990s in the United States, with FBI officials reporting

a 90% increase in crimes and a 40% increase in convictions (Cochran & Shelnutt, 2014; McCarthy, 2014; Stowell et al., 2014). FBI staff estimated the average annual losses due to mortgage fraud were $4 billion to $6 billion (Baker, 2014; Cochran & Shelnutt, 2014; McCarthy, 2014; Stowell et al., 2014).

The housing bubble burst in 2007, which resulted in the Great Recession of 2008 and caused a weakening effect on the financial stability of the world (Cochran & Shelnutt, 2014; Ferreira & Gyourko, 2015; Stowell et al., 2014). The loss due to mortgage fraud exceeded $10 billion during the 4-year period of 2009–2013 (Stowell et al., 2014). Mortgage fraud is relevant to my study because of its similarity to rental housing fraud, and both types of fraud are white collar crimes. The federal government subsidizes the financing of rental property, and many of those properties were part of the mortgage fraud schemes committed during the 2000s (Cochran & Shelnutt, 2014; McCarthy, 2014; Stowell et al., 2014). Mortgage fraud affects the neighboring community and often results in increased insurance and property taxes, including those of rental properties (Carswell, Seay, & Polanowski, 2013; Cochran & Shelnutt, 2014; McCarthy, 2014; Stowell et al., 2014).

The Sarbanes-Oxley Act mandates that audit committees develop internal reporting channels for employees to remain anonymous when reporting accounting fraud issues on audits (Banerjee, Humphery-Jenner, & Nanda, 2015; Bartov & Faurel, 2016; Ge, Koester, & McVay, 2017). The Dodd-Frank Act has significant financial incentives to motivate employees to report fraud to the Securities and Exchange Commission (Christensen, Floyd, Liu, & Maffett, 2017; Kennedy, 2014; Parrino, 2016). To counteract

concerns that employees might bypass reporting fraud internally, many employers developed internal incentives to motivate employees to report fraud (Bartov & Faurel, 2016; Li, 2014; Parrino, 2016; Taylor, 2014). Based on research I have found for my study, I have highlighted strategies that housing and business executives use internally with employees to deter fraud. Some strategies incorporated some of the mandates of the Sarbanes-Oxley Act to keep reporting channels anonymous.

During the 1990s and the initial years of the 21st century, U.S. homeownership rates steadily increased, with a reported high of 70% in 2004 (Pontell, Black, & Geis, 2014). Contributing factors of the increase included expansion of credit made available by an increase in foreign credit, low interest rates, and a significant relaxation of underwriting standards (Pontell et al., 2014). When the Treasury rate reached a historical low of 1% in 2005, homeownership rates increased and property values and sale prices rose quickly, but wages were stagnant (Ferreira & Gyourko, 2015). Buyers paid an average of four times their salary for homes in 2006 (Ferreira & Gyourko, 2015; Pontell et al., 2014; Stowell et al., 2014). With low interest rates, many homeowners refinanced their homes to lower their monthly payments or to withdraw the added equity from the inflated property values as cash (Ferreira & Gyourko, 2015).

The Federal Reserve Board increased the interest rate from 1% to 5.25%, raising it 17 times between 2004 and 2006 (Ferreira & Gyourko, 2015). Home values dropped drastically in 2007 and continued for several years while adjustable-rate mortgage rates began increasing (Ferreira & Gyourko, 2015; McCarthy, 2014; Stowell et al., 2014). Increasing adjustable-rate mortgage rates caused many homeowners to suffer financially

from the substantially increased loan payments, with many of the payments doubling (Ferreira & Gyourko, 2015; McCarthy, 2014; Stowell et al., 2014). After the housing bubble burst, many borrowers were in homes they could no longer afford, with the added stress of foreclosure and cost of relocation (Baker, 2014; Ferreira & Gyourko, 2015; McCarthy, 2014; Stowell et al., 2014).

Some economists have placed the blame for the Great Recession of 2008 on several phenomena, with subprime lending being the predominant cause (Baker, 2014; Ferreira & Gyourko, 2015; Stowell et al., 2014). Economists purported that federal government officials, and the way they handled the residuals of the financial crisis, played a significant role in the recession of 2008 (Baker, 2014; Cochran & Shelnutt, 2014; Stowell et al., 2014). Economists further purported that the weaknesses in the financial regulatory system before the recession were the underlying trigger that led to the financial crisis (Baker, 2014; McCarthy, 2014; Stowell et al., 2014).

FBI officials denoted the two primary types of mortgage fraud as *fraud for profit* and *fraud for property* (Adelino, Schoar, & Severino, 2016; Eriksen, Kau, & Keenan, 2013; Nguyen & Pontell, 2010). Fraud for profit often involves multiple industry insider intermediaries, such as mortgage brokers (Adelino et al., 2016; Eriksen et al., 2013; Nguyen & Pontell, 2010). Unregulated lenders increased the subprime mortgage market by engaging in high-risk lending by funding a significant number of adjustable-rate, interest-only mortgages, and stated-income loans (Adelino et al., 2016; Baker, 2014; Eriksen et al., 2013; Ferreira & Gyourko, 2015; Nguyen & Pontell, 2010). Lenders qualified borrowers for stated-income loans based on the incomes borrowers stated on

their application, unsupported by any documentation (Adelino et al., 2016; Eriksen et al., 2013; Ferreira & Gyourko, 2015). As the housing bubble burst, the default on high-interest adjustable-rate subprime mortgages rose, which culminated in a sharp increase in home foreclosures (Adelino et al., 2016; Eriksen et al., 2013; ; Ferreira & Gyourko, 2015; Johnson & Li, 2014; Nguyen & Pontell, 2010).

The significant increase in the number of incidences of mortgage fraud prompted FBI officials to investigate more home foreclosures (Eriksen et al., 2013; Nguyen & Pontell, 2010). Lenders' portfolios of subprime mortgages reached a high of $600 billion in 2006 and represented 20% of the total home mortgages in the United States (Adelino et al., 2016; Eriksen et al., 2013; Ferreira & Gyourko, 2015). The subprime mortgage rate represented an increase from 9% in 1996 (Adelino et al., 2016; Eriksen et al., 2013; Ferreira & Gyourko, 2015). U.S. homeownership rates rose to 69% in 2004, which led house prices to increase substantially (Adelino et al., 2016; Eriksen et al., 2013; Nguyen & Pontell, 2010). The domino effect included a 124% rise in home values between 1997 and 2004 (Adelino et al., 2016; Eriksen et al., 2013; Ferreira & Gyourko, 2015; Nguyen & Pontell, 2010). Investigators at the FBI identified the following list of other common types of fraudulent mortgage schemes they have investigated (Cochran & Shelnutt, 2014; Fligstein & Roehrkasse, 2016; McCarthy, 2014):

- Appraisal fraud: An intentional overstatement of home value that qualifies a borrower for a higher loan amount or more cash out at closing.

- Employment or income fraud: To be eligible for a loan, borrowers overstate their income on a stated-income application. Such fraud is also evident when a borrower alters the W-2 or employer information.

- Failure to disclose liabilities: Borrowers intentionally omit liabilities to lower their debt-to-income ratio to qualify for a higher loan amount.

- Occupancy fraud: Borrowers who want to borrow funds for an investment property list the property as their personal residence.

- Mortgage fraud ring: An elaborate mortgage fraud scheme to defraud a lender, with multiple players such as the borrower, appraiser, and attorney. An example may include an appraiser who overstates a property for a straw borrower whose credit secures a very large loan, an attorney who prepares two sets of closing documents, and a property owner.

- Identity theft: Borrowers assume the identity of a homeowner and use the property as collateral for a loan.

- Shot gunning: Borrowers secure multiple loans simultaneously for the same property. Perpetrators usually leave the country to avoid criminal prosecution. With the increased use of high-technology equipment, this type of fraud has become less prevalent.

- Cash-back schemes: Collusion exists between buyers and sellers, or buyers and realtors, to deceive lenders regarding the actual sale price of a home.

Appraisers are usually a party to the scheme, and consumers receive a cash rebate after loan closing.

- Other: Wire fraud, securities fraud, foreclosure scams, and conspiracy to misrepresent investment information to investors.

A 2012 study on fraudulent mortgage schemes indicated 26 states had massive mortgage fraud problems, with Florida and Georgia identified as the two predominant southern states (Adelino et al., 2016). The mortgage fraud crisis affected the entire United States (Adelino et al., 2016; Baker, 2014; Fligstein & Roehrkasse, 2016; Stowell et al., 2014). Findings from another study conducted on mortgage fraud using credit bureau and mortgage data, reported occupancy fraud was prevalent during 2005-2007 (Elul & Tilson, 2015). According to several mortgage fraud studies, the biggest hit in mortgage fraud was in markets where lenders used government-sponsored enterprises' investment instruments to finance mortgages (Adelino et al., 2016; Baker, 2014; Elul & Tilson, 2015; Fligstein & Roehrkasse, 2016; Johnson & Li, 2014; Stowell et al., 2014).

The TPB was one of the frameworks used for a study on mortgage origination fraud committed by subprime lender employees (Nguyen & Pontell, 2010). The study included a pool of 23 individuals who were mortgage brokers, lenders, escrow agents, title agents, and appraisers (Nguyen & Pontell, 2010). The mortgage origination fraud study included statistical information from the onset of the mortgage fraud debacle in 2006 through 2009 (Nguyen & Pontell, 2010). The majority of the participants of the study denied committing fraud (Nguyen & Pontell, 2010). The participants asserted that they believed they had an obligation to do their jobs and provide their clients with what

they wanted (Nguyen & Pontell, 2010). Many of the study participants perceived their

actions of overstating borrowers' income and assets, postdating documents, and altering

employment titles as acceptable lending practices (Nguyen & Pontell, 2010). These

behaviors were indicative of the TPB, which theorists describe as a concept for describing

human behaviors shaped by individual attitudes, belief systems, and intentions (Ajzen,

2015; Ajzen & Sheikh, 2016; Chen, 2016). In another study that focused on mortgage

fraud detection, Mian and Sufi (2017) purported that although the FBI recognizes fraud as

a large factor in high foreclosure rates, empirical research is lacking. Mian and Sufi

(2017) proposed a tool to detect and measure mortgage fraud.

Findings from the mortgage origination fraud study revealed mortgage brokers

served as the key person for all aspects of the process (Nguyen & Pontell, 2010).

Outcomes from the mortgage origination fraud study revealed a high incidence of fraud

and the importance of having a willing lender or appraiser who would bend the rules

(Nguyen & Pontell, 2010). Other common factors included having a particular loan

product or a cooperative borrower to consummate the loan in an illegal manner (Nguyen

& Pontell, 2010). Recommendations from the Nguyen and Pontell (2010) study on

mortgage reform included (a) adopting tighter policies and lending practices and (b)

greater government oversight and enforcement. Other recommendations from the

mortgage origination fraud study included restructuring the mortgage industry

compensation system and higher scrutiny of all parties involved (Nguyen & Pontell,

2010). Findings from the mortgage fraud detection study indicated weak loan

underwriting and fluctuating high house prices are the major contributors to high

mortgage foreclosure rates (Adelino et al., 2016; Baker, 2014; Mian & Sufi, 2017). Much

of the documented mortgage fraud transactions derived from the domino effect of relaxed

loan underwriting criteria (Adelino et al., 2016; Baker, 2014; Mian & Sufi, 2017; Elul &

Tilson, 2015).

The mortgage fraud detection tool proposed in the mortgage fraud detection study

was critical for several reasons (Mian & Sufi, 2017). The fraud detection tool can

substantiate the function and influence of fraud in the foreclosure market (Mian & Sufi,

2017). Another important reason for creating the tool is its ability to serve as a legal

mechanism of fraud deterrence (Mian & Sufi, 2017). Finally, a fundamental reason for

developing the detection tool is to prove mortgage fraud erroneously increases house

prices because of a distorted house price index (Mian & Sufi, 2017).

Underlying Causes for Individuals Committing Fraud

There is an assortment of theories on the nature of corruption (D'Arcy, 2008; de

Graaf & Huberts, 2008; Jacobs & Manzi, 2014; Zijlstra & van Bortel, 2014). Tucker

(2014) purported the source of the housing problem in the United States was the federal

government and its lack of commitment to providing affordable housing to low-income

families. Corruption among federal officials was another element that influenced the

housing problem (D'Arcy, 2008; Tucker, 2014). Theorists contended the housing fraud

problem was the failure of federal housing policies in three major areas (de Graaf &

Huberts, 2008; Jacobs & Manzi, 2014; Zijlstra & van Bortel, 2014). First, Congress

reduced federal housing assistance substantially (de Graaf & Huberts, 2008; Jacobs &

Manzi, 2014; Zijlstra & van Bortel, 2014). In 1981, Congress appropriated $32 billion to

HUD and reduced HUD's budget in 1989 by 78% to a low of $6.9 million (Ellen, 2018; Seicshnaydre, 2016; Tucker, 2014). Second, the federal government ignored its 50-year commitment to replenish public housing stock. Third, HUD officials mismanaged and embezzled federal funds (de Graaf & Huberts, 2008; Ellen, 2018; Tucker, 2014; Walter & Wang, 2016).

Erstwhile Benefit Fraud Inspectorate. In 1997, the government launched the Erstwhile Benefit Fraud Inspectorate (BFI), which became one of the most comprehensive pieces of research studies on what motivated individuals to commit fraud (D'Arcy, 2008; Mitton, 2009; Walsh & Bull, 2013). Researchers conducted the BFI study in response to a concern regarding the alarming level of social security fraud in the United States (D'Arcy, 2008; Mitton, 2009). In addition to social security fraud, researchers of the BFI study focused on other key areas, such as housing benefits, pension credit, retirement pension, and council tax benefit (D'Arcy, 2008; Mitton, 2009). The goal was to identify the reasons behind government fraud (D'Arcy, 2008; Mitton, 2009). The two conceptual frameworks steering the BFI study were the TPB and the fraud triangle theory (D'Arcy, 2008; Mitton, 2009). Researchers of the BFI study focused on answering two questions:

- What lessons individuals might learn about benefit fraud from research in the fields of social policy, public economics, law, and social psychology (Mitton, 2009)?

- Can theorists turn what they learn from the cases of fraud into ideas for reforming the benefits system (Mitton, 2009)?

Study results revealed that 84% of the respondents to the BFI study believed large numbers of individuals falsely claimed benefits (D'Arcy, 2008; Mitton, 2009). Milton (2009) purported that individuals committed fraud because of the local culture, financial pressure, and personal validations for having committed fraud, opportunity, and rigidity of the benefits system. Researchers of the BFI study concluded motivations for fraud included a client's attitude and perceptions, which are part of the foundation of the TPB (Ajzen, 2015; Mitton, 2009; Varady et al., 2017). The motivations for fraud were complex, and people had disparate personalities (Ajzen, 2015; Elul & Tilson, 2015; Mitton, 2009).

Nature of corruption. Corruption has been a worldwide problem for many decades, ranging from unethical behavior, dishonesty, and theft, to deception and malicious intent (de Graaf & Huberts, 2008; Jancsics, 2014; LaMort, 2015; Teresa, 2015). Some theorists have labeled the extortion of preexisting rents as corruption (Doig, 2018; Jancsics, 2014). Lindberg and Seifert (2016) purported market competition reduces the incidence of corruption.

De Graaf and Huberts (2008) conducted quantitative studies that revealed certain variables of corruption, although they noted that quantitative research did not tell the whole story regarding the nature of corruption. De Graaf and Huberts (2008) purported that they ignored the characteristics and details of the context of each case of corruption. De Graaf and Huberts' (2008) study is related to the current study because the researchers used the TPB to explore that the reasons individuals commit fraud and corruption and how they use their beliefs, subjective norms, and perceptions of control. In contrast, the

focus of several empirical studies on the evolution of corruption in India was on causes of government bribery and employees' acceptance of bribes for the distribution of rents (Bussell, 2013). The goal of the India studies was to answer the following questions about corruption regarding rent distribution: (a) Are the disbursements of proceeds from a single bribe distributed equitably across all segments. (b) If so, do various ranks of officials benefit differently from the different types of corruption? (c) What dynamics, such as official types and level of government centralization, relate to these disparities in rent disbursements (Bussell, 2013)?

Findings from the study on corruption in India provided substantiation of a connection between the employees' attitude toward level of government centralization and rent distributions (Bussell, 2013). The allocation of rents was higher in mid-level corruption in a centralized government structure (Bussell, 2013). The India study findings validated the belief that diverse ranks of government officials (low-level, mid-level, and high-level) would most likely benefit from a diverse pool of corrupt activities (Bussell, 2013). The India study findings were explicit enough to document the rank of government benefited the most and the least (Bussell, 2013). The foundation of the TPB that there is a high correlation between different attitudes and subjective norms to what provoked the perpetrators to commit fraud, were prevalent in the India study on corruption.

Additional Research of the Problem of Fraud

An example of a conflict of the fraud theories is the former vice-chairman of Wal-Mart who committed $500,000 in fraud while earning a salary of more than $6 million

(Doig, 2018; Hollow, 2014; Rhode, 2017). In this example, the fraud triangle theory

supported the claim that an opportunity to commit fraud promotes the idea that individual

fraudulent behavior is more than just motivation. Using the TPB in this example showed

that the fundamental variables of why people committed fraud included their culture,

characteristics, and personal motivations (Ajzen, 2015; Dickins & Fay, 2016; Elul &

Tilson, 2015).

Another example of the conflict of fraud theories was the former chief executive

officer (CEO) and chief financial officer of Tyco International whom embezzled $600

million (Abdullahi & Mansor, 2015; Raval, 2018; Rhode, 2017). Tyco's CEO and chief

financial officer committed fraud through unauthorized loans, bonuses, and other

extravagant spending of company funds (Abdullahi & Mansor, 2015; Raval, 2018;

Rhode, 2017). In the Tyco embezzlement example, the fraud triangle theory supported

the use of opportunity to commit the fraud (Abdullahi & Mansor, 2015; Doig, 2018;

Morales et al., 2014; Raval, 2018; Rhode, 2017; Sandhu, 2016). In contrast, the TPB in

the Tyco example encompassed the concept that an individual's attitude toward behavior

and perceived behavioral control influence behavior and behavioral intentions (Ajzen &

Sheikh, 2016; Ajzen, 2015).

Researchers conducted a comparative study of corporate failures of three

American (HealthSouth, WorldCom, and Enron) and three European (Vivendi Universal,

Parmalat, and Royal Ahold), using the TPB as the theoretical framework (Soltani, 2014).

The researchers chose these particular corporations because they were the largest high-

profile corporate failures on an international level. Ethical climate is a type of work

climate within the organizations (Soltani, 2014). The ethical climate areas studied

included tone of top executives, bubble economy and pressures from the market, auditing

and governance, management compensation, accountability, and control (Soltani, 2014).

Researchers used the TPB to determine how the areas of ethical climate influenced the

moral norms and behavior of executives to commit fraud (Ajzen & Sheikh, 2016; Ajzen,

2015). Researchers examined the six corporate failures from the viewpoint of specific

characteristics of the companies and environmental factors (media coverage and academic

literature, regulatory and corporate governance framework) (Soltani, 2014).

Study findings indicated that although the three American corporations were

different from the three European corporations, they all suffered from unethical behavior

influenced by the moral norms of the CEOs and the intent of their behavior (Soltani,

2014). Study findings revealed that ineffective boards and dysfunctional management,

coupled with a lack of internal controls, accountability, and auditing and governance,

resulted in an environment susceptible to fraud (Morales et al., 2013; Sandhu, 2016;

Soltani, 2014).

Housing leaders who desire to develop strategies to combat fraud should

incorporate all facets of what impels individuals to commit fraud (Ellen, 2018; Hamilton

& Slatten, 2013; Seicshnaydre, 2016). Although theorists have conducted substantial

research on the psychological aspect of why individuals commit fraud, little research

exists on the reasons recipients of housing subsidies commit fraud (Ellen, 2018; Hamilton

& Slatten, 2013; Seicshnaydre, 2016).

Pilot Solutions to the Problem of Rental Housing Fraud

From the 2000 Assisted Housing Quality Control Study findings, HUD officials

developed targeted measures to tackle the causes of subsidy fraud, including onsite

evaluations of PHAs (HUD, 2013). Researchers at the HUD OPDR conducted the

QCRA study in 2001 using the TPB (HUD, 2001). Study findings indicated that 60% of

the rent calculations contained rent, administrative, or component errors (HUD, 2001).

From the 2003 HUD OPDR study, HUD officials implemented the Rental Housing

Integrity Improvement Project [RHIIP] (McClure et al., 2014). The objective of the

RHIIP was reducing errors and ensuring benefits agencies pay subsidies for only eligible

families (McClure et al., 2014). The RHIIP provided training and technical assistance,

program guidance, incentives, sanctions, program simplification, up-front income

verification, and the rental integrity-monitoring model to PHA management (HUD, 2012;

HUD, 2013; McClure et al., 2014). The Office of the Chief Financial Officer headed the

project, along with representatives from other areas (HUD, 2012; HUD, 2013). Housing

leaders met periodically as a committee to review and monitor the progress of the RHIIP

(HUD, 2012, 2013; McClure et al., 2014).

Other efforts HUD leaders implemented to address the findings of the 2003 study

included new HUD policy guidebooks and handbooks (HUD, 2012; HUD, 2013;

McClure et al., 2014). The guidebooks included standardized information on all HUD

programs and a defined methodology for computing all aspects of tenant eligibility

(HUD, 2012; HUD, 2013; McClure et al., 2014). Other benefits of the study findings

included national and regional training for PHA staff and regular on-site management

reviews of PHA programs (HUD, 2012; HUD, 2013; McClure et al., 2014). The HUD

leaders also implemented regular on-site rental integrity monitoring reviews of targeted

PHAs (HUD, 2012; HUD, 2013; McClure et al., 2014).

Implementation of New Strategies to Address the Problem of Fraud

Fraud has become seemingly more complex, and detecting individuals who are in

collusion is a challenge (Bashir & Khan, 2015; Mian & Sufi, 2017; Mayer et al., 2014;

Seicshnaydre, 2016; Walter & Wang, 2016). The median loss from fraud committed in

collusion is much greater than when one individual commits the act (Mian & Sufi, 2017;

Cohen et al., 2017; FBI, 2013; Tan et al., 2015; U. S. GAO, 2014). Internal auditors

often ignore the potential of fraud collusion when conducting a fraud assessment (Bashir

& Khan, 2015; FBI, 2013; Mayer et al., 2014; U. S. GAO, 2014). One of the

predominant fraud detection techniques is a detection system that combines enterprise

planning and e-mail and telephone logs to detect fraud collusion among individuals

(Bashir & Khan, 2015).

Empowerment of employees to combat fraud. Researchers of behavioral and

psychological studies using the TPB have validated the significance of employee

participation and peers' influence on coworkers' behavior (Bradley, 2015; Lindberg &

Seifert, 2016). Deficiencies exist in strategies to address the role employees should play

in mitigating fraud (Bradley, 2015; Brown, Hays, & Stuebs, 2016; Li et al., 2016).

Theorists believe employers should make it known to employees that employees are

important in shaping the culture of the organization and are participating in efforts to

detect and deter fraud (Mayer et al., 2014; Stahl & de Lugue, 2014; Wong &

Venkatraman, 2015). Recommendations from the findings on how to design an effective

fraud prevention program included employees serving a meaningful and visible function

in the prevention of fraud (Bradley, 2015; Mayer et al., 2014). Another strategy included

employees engaging in endless discussions regarding fraud prevention and acceptable

work ethics (Bradley, 2015; Mayer et al., 2014; Pozzolo et al., 2014). Engaging

employees in an organization's fraud prevention should have three goals: (a) establish

ethics as an important and acceptable part of the organization; (b) impel employees to

initiate action against coworkers committing fraud; and (c) develop leaders with integrity,

good morals, and a strong value system (Bradley, 2015).

In a study built on the TPB, equity theory, and reinforcement theory, researchers

studied retail employees' perception of factors influencing the behavior of employees to

commit theft in Malaysia supermarkets (Moorthy, Seetharaman, Jaffar, & Foong, 2015).

Researchers studied the correlation of the impact internal controls had on individuals'

intention to steal. Researchers selected 74,300 employees from eight Malaysia

supermarket chains, consisting of retail employees such as cashiers, sales assistants,

supervisors, and managers. Researchers used a 5-point-Likert scale questionnaire in the

study to measure the mediating effects of the intent to steal. Of the 600 questionnaires

distributed, 492 participants returned them, with 450 questionnaires being usable. Under

the TPB, the study incorporated seven independent variables, ethical work climate,

justice, personal characteristics, opportunity, need, compensation, and coworker theft and

punishment.

Factors within an organization can induce employee behavior to commit theft in the workplace (Moorthy et al., 2015). Internal control systems are factors connecting the correlation between an employee's intent to steal and workplace behavior of theft (Moorthy et al., 2015). As with the foundation of the TPB, employee's moral norms and commitment to the organization are likely to influence retail theft (Moorthy et al., 2015). Study findings indicated that when employers explicitly told employees that they would not tolerate theft under any circumstance, the employees had more difficulty rationalizing the commitment of theft.

Double-entry bookkeeping. Double-entry bookkeeping began in the 14th century (Bryer, 2016; Mann, Funnell, & Jupe, 2016; Sangster, 2015). The historical case of *United States v. Charlene Corley* provided a foundation to explore fraud detection tools. Darlene and Charlene Corley were twins who owned a hardware store and executed a contract with the U.S. Department of Defense, later called the Defense Finance & Accounting Service [DFAS] (Teplitsky & Harris, 2015). The DFAS had ineffective internal controls in place for its billing and collections activities for government contractors (Singh, Best, Bojilov, & Blunt, 2014). The DFAS staff would accept invoices and pay them without verifying if the vendor had shipped the products and the DFAS had received them, and the Corley twins discovered the system had significant weaknesses (Teplitsky & Harris, 2015). The country was at war during this era, and DFAS employees were paying bills as quickly as they received invoices (Teplitsky & Harris, 2015).

The government eventually discovered the elaborate scheme when the Corley twins accidentally submitted a bill twice for the same contract, and the system kicked it out (Teplitsky & Harris, 2015). After further investigation, a DFAS investigator discovered the twins had billed the DFAS almost $1 million in shipping charges for two $0.19 washers (Teplitsky & Harris, 2015). The twins tried to resolve the case by offering to pay the government $4.5 million, but the government would not accept this restitution settlement (Teplitsky & Harris, 2015). Darlene committed suicide, and the courts sentenced Charlene to 6.5 years in prison for wire and money laundering (Teplitsky & Harris, 2015). The Corley twins defrauded the government for more than $20 million by submitting bids and inflated shipping invoices (Teplitsky & Harris, 2015).

Embedded audit modules. A study of fraud detection methodology included a new fraud detection module called embedded audit modules (Krahel & Titera, 2015; Singh et al., 2014; Zhang, Yang, & Appelbaum, 2015; Yoon, Hoogduin, & Zhang, 2015). The controls can serve as a safeguard to organizations by reducing costs and speeding up response time, which will protect businesses from unfair exposure and improve efficiency (Krahel & Titera, 2015; Singh et al., 2014; Yoon et al., 2015; Zhang et al., 2015). Staff can continuously monitor core business processes, via embedded controls, and mathematical modeling (Krahel & Titera, 2015; Singh et al., 2014; Yoon et al., 2015; Zhang et al., 2015). Doing so provides an easier way to detect quantifiable errors in real time. Business leaders are also able to segregate duties more distinctly. The embedded modules serve as excellent fraud prevention tools (Krahel & Titera, 2015; Singh et al., 2014; Yoon et al., 2015; Zhang et al., 2015). Budgetary controls are another type of fraud

prevention and detection tool that is inexpensive for organizational leaders to use (Liu et al., 2015; Tan et al., 2015; Teplitsky & Harris, 2015).

Enterprise Income Verification (EIV) system. In 2010, the U.S. Congress passed the Implementation of Refinement of Income and Rent Rule (HUD, 2013; McClure et al., 2014). The rule mandated an effective date of January 31, 2010, for using the highly sophisticated web-based EIV for every household's interim and annual reexamination for rental housing assistance (HUD, 2013). The goal of HUD staff with the mandate was to increase income and household composition data integrity for recipients of federally subsidized multifamily rental assistance housing programs (HUD, 2013; McClure et al., 2014; Seicshnaydre, 2016; Walter & Wang). One of the reports of the EIV provides information on deceased tenants for which PHAs are paying subsidies in error (HUD, 2013; McClure et al., 2014). The EIV reports will also provide a red flag, and a correlating report, for tenants receiving a subsidy from more than one HUD-funded property (HUD, 2014; McClure et al., 2014).

Mitigation Efficacy

In 2009, as a channel to combat fraud, President Obama issued Executive Order No. 13,520, Reducing Improper Payments and Eliminating Waste in Federal Programs (Hamilton & Slatten, 2013; HUD, 2012; HUD, 2013; Werfel & Steinhoff, 2014). President Obama further reinforced the executive order with a new law in 2010: the Improper Payments Elimination and Recovery Act of 2010 (Hamilton & Slatten, 2013; HUD, 2012; HUD, 2013). This law expanded the latitude of the Improper Payments Information Act of 2002 and added critical enforcement to requirements of the

president's executive order (Hamilton & Slatten, 2013; HUD, 2013). Because of this decree, federal government officials reported a 35% reduction (from 5.42% to 3.53%) in improper payments from 2009 to 2013 payments (Werfel & Steinhoff, 2014). This reduction equated to an estimated $93 billion savings, by not disbursing improper housing assistance payments (Werfel & Steinhoff, 2014).

Training and educational deficiencies. Effective interviewing skills are paramount to fraud detection (Seicshnaydre, 2016; Walsh & Bull, 2012; Walter & Wang, 2016). The ability of an interviewer to build a good rapport with a defendant enables the suspect to share information more freely during an interview (Al-Alwani, 2015; Jancsics, 2014; Walsh & Bull, 2012). In a study using the TPB, Walsh and Bull (2013) conducted semistructured interviews with criminals who committed benefits fraud in England and Wales at the Department of Work and Pensions. Walsh and Bull (2012) used an established methodology to evaluate rapport-building skills in the initial phase of the interviews. Establishing rapport with a suspect at the onset of the interview is as important as maintaining an adequate level of rapport throughout the interview (Al-Alwani, 2015 Jancsics, 2014; Liu et al., 2015; Walsh & Bull, 2012). In a mixed methods study using the TPB, Hoyer, Zakhariya, Sandner, and Breitner (2012) examined the human factor integrated into a qualitative component of a fraud audit and used the standard quantitative analysis of business transactions auditors typically apply as a part of a fraud audit.

The findings from the England and Wales study provided the data law enforcement needed to change some of the training and laws used and enforced (Walsh &

Bull, 2013). Findings from the fraud audit study indicated the standard quantitative

analysis approach provided value to the study because auditors were able to differentiate

and prioritize the transactions audited (Hoyer, Zakhariya, Sandner, & Breitner, 2012).

Study outcomes reflected a greater level of fraud discovery than typically remains

uncovered due to the auditors incorporating suspicious and nonsuspicious behavior of the

individuals committing fraud (Hoyer et al., 2012).

   Lack of effective internal controls. Fraud is a rapidly growing multibillion-

dollar phenomenon that continues to escalate annually (Anacker, 2014; McClure et al.,

2014; Walter & Wang, 2016). Many organizational leaders are not able to detect and

mitigate fraudulent schemes (Anacker, 2014; Christensen, Mackey, & Whetten, 2014;

McClure et al., 2014; Walter & Wang, 2016). Fraud detection strategies should be able

to identify expediently any fraudulent activities that elude preventive measures (Anacker,

2014; Hu, Carvalho, Laera, Lee, Matsutsuka, Menday & Naseer 2013; Liu et al., 2015;

Yoon et al., 2015; Zhang et al., 2015).

   Fraudulent welfare benefit claims cost the U.K. government 1.6 billion in 2011,

and the amount has continued to increase substantially each year (Hu et al., 2013). Fraud

detection caseworkers participated in Hu, Carvalho, Laera, Lee, Matsutsuka, Menday, and

Naseer (2013) study conducted in the United Kingdom on determining the barriers and

inefficiencies of detecting fraud in welfare benefits cases. Data silos are the chief barrier

to fraud detection across the United Kingdom, between departments and across domains,

because government caseworkers tend to focus on a single data source (Hu et al., 2013).

The four barriers and inefficiencies in the detection of fraud were (a) semantic deficiency,

(b) siloed sources of information, (c) model rigidity, and (d) immaturity of a distinct

business model (Hu et al., 2013). Observing the process used in the fraud department and

evaluating case files and historical data led to discovering mismatches throughout the

various government depositories (Hu et al., 2013). Although the U.K. government used

e-governance in the welfare program, the use of data warehousing was not common, so

the integration of public sector data was not efficient. The U.K. government study

findings indicated the caseworkers were rigid in their case evaluation and did not readily

look for abnormalities in newly identified fraud cases (Hu et al., 2013). Researchers

conducted another U.K. study using the convictions of 12 cases of organized crime

conducted in legitimate corporations (Hu et al., 2013). The U.K. organized crime study

findings revealed financial investigations at the prearrest stage of the investigation were

paramount (Hu et al., 2013).

The design for the online analytical processing fraud detection tools used by U.K.

caseworkers was not sufficient for detecting welfare benefit fraud (Hu et al., 2013). One

technique used in the U.K. case study was a blacklist of identified perpetrators against

which workers matched new claims. The reconciliation of new and existing claims

provided an essential foundation for fraud detection in the U.K. case study (Hu et al.,

2013). Using a system to integrate data more efficiently reduced the number of

previously undetected claims. Hu et al. (2013) used a sophisticated graph analysis

algorithm of fraudulent cases to duplicate all data in storage, which helped to identify

new fraud patterns and methods. Other methods included accelerating fraud

identification with rule-based extrapolations (Hu et al., 2013). The successful approach

to the U.K. case study included focusing on a particular problem to avoid draining resources. The pilot study project was successful with the aid of semantic technologies to link multiple data sets to identify fraud models (Hu et al., 2013).

The Cost of HCV Program Tenant Fraud and Abuse

In 2012, of the 124,000-reported tenant fraud cases in the United States, 92% were from housing benefit fraud, and 77% of the annual losses of $179 million were from housing-benefit fraud (Wu & Wu, 2012). Rental housing fraud in the United States in 2012 exceeded $900 million (Greenlee, 2014; HUD, 2013; Wu & Wu, 2012). Corrupt individuals abuse power entrusted to them, while fraud is an intentional act to deceive others for gain (Asongu, 2013; Greenlee, 2014; Purcell, 2016; Sandhu, 2016; Simpson, 2013).

Private developers of the Section 8 Moderate Rehabilitation program received $4 billion in misappropriated funds (Anacker, 2014; Tucker, 2014). Officials at HUD designed the Section 8 Moderate Rehabilitation program to award grant funding to private developers to renovate homes in exchange for renting the homes to very-low-income families (Huth, 2014; Seicshnaydre, 2016; Walter & Wang, 2016). Leaders at HUD set the rents higher than the fair market rents for the Section 8 Moderate Rehabilitation Program (Huth, 2014).

Results of investigative studies of the corruption discovered in HUD programs revealed that $2 billion of misappropriated funds went to private contractors of the Section 8 Moderate Rehabilitation program (Anacker, 2014; Tucker, 2014). Study findings on corruption in HUD programs revealed middle-class families occupied many

of the renovated Section 8 (aka HCV) homes, instead of eligible poverty-stricken families

(Anacker, 2014; Tucker, 2014). Findings also showed the Section 8 program experienced

corruption at the local PHA level that resulted in a substantial loss of federal funding to

the government (Anacker, 2014; Tucker, 2014). The Section 8 Moderate Rehabilitation

program study is relevant because I can illustrate a comparison of the Section 8 Moderate

Rehabilitation program with the types of tenant corruption in the HCV program.

Officials at HUD replaced the Section 8 program with the HCV program (Ellen, 2018;

Huth, 2014; Walter & Wang, 2016).

Gaps in Research

The goals of federally subsidized housing program studies are to simplify

administrative policies and procedures (Greenlee, 2014; HUD, 2001; Huth, 2014;

Seicshnaydre, 2016). Executives at HUD conduct subsidized housing studies to improve

regulatory reforms to increase the number and quality of tools and resources available to

use for fraud detection procedures (Greenlee, 2014; HUD, 2001, 2012, 2013). From the

various studies conducted, HUD leaders have implemented improved internal control

policies and procedures (Greenlee, 2014; HUD, 2001, 2012, 2013). HUD leaders have

made a substantial amount of progress in developing and implementing accounting

systems and internal controls to detect fraud (Greenlee, 2014; Huth, 2014; Walter &

Wang, 2016). However, fraud and abuse in federally funded rental housing programs

have continued to grow astronomically (Greenlee, 2014; Huth, 2014; Seicshnaydre,

2016).

State and federal government financial systems have continued to experience many burdens from fraudulent payment disbursements on behalf of families living in subsidized housing (Greenlee, 2014; Huth, 2014; Walter & Wang, 2016). My study focused on tenant fraud, while the other areas of rental housing fraud committed by housing executives and business owners require additional research. Additional research is also necessary on the various laws related to combatting fraud and the accompanying sanctions for agencies that do not comply with said laws (Greenlee, 2014; Hamilton & Slatten, 2013; Walter & Wang, 2016). One of the underlying reasons there is not an abundance of literature available on low-income housing is many individuals presume that the government provides the majority of low-income housing (Deng, n.d.; Greenlee, 2014; Hamilton & Slatten, 2013; Walter & Wang, 2016). Another reason for the lack of literature on subsidized housing is many people equate low-income housing to slum housing and give little value to the issue (Deng, n.d.; Greenlee, 2014; Hamilton & Slatten, 2013; Walter & Wang, 2016).

Transition and Summary

Section 1 included the foundation of the study, background of the problem, the problem statement, and purpose statement, nature of the study, the research question, and the interview questions used as the data collection tool. Section 1 also included a description of the conceptual framework used to guide the study and operational definitions. I included a description of the assumptions, limitations, and delimitations of the study. Section 1 also included the significance of the study. Finally, Section 1 included a review of the professional and academic literature.

Section 2 includes a comprehensive overview about this research, the purpose of the study, the role of the researcher, participants, research method and design, population and sampling, and ethical research. In Section 2, I also provided specific details related to data collection, including the data collection instruments used, data collection techniques, data organization techniques, and data analysis. Section 3 of the research study includes presentation of research findings, applications to professional practice, implications for social change, recommendations for action, and recommendations for further action. Section 3 also includes my recommendations for further research, study limitations, a discussion of personal reflections, and a summary and research conclusions.

Section 2: The Project

Section 2 includes a discussion of the study, which includes the purpose

statement, my role as the researcher, participants in the study, research method and

design, population and sampling, and ethical research. Also included in the discussion

are data collection techniques, data organization techniques, data analysis, and reliability

and validity, as well as the transition and summary. Section 3 includes a discussion of the

research findings, applications to professional practice, implications for social change,

recommendations for action, and recommendations for further action. Section 3 also

includes recommendations for further research, study limitations, a discussion of personal

reflections, a summary, and research conclusions.

Purpose Statement

The purpose of this qualitative multicase study was to explore strategies some

business executives use to detect and eliminate tenant fraud in subsidized rental housing.

The target population of this study consisted of six business executives located in central

Florida, possessing successful experience in detecting and eliminating tenant fraud in

subsidized rental housing. This study might contribute to positive social change through

finding strategies that deter fraudulent criminal activities in rental housing and increase

revenues for private business owners of subsidized rental properties. Housing leaders

might benefit from this study by garnering a greater understanding of effective leadership

models and strategies used to combat tenant fraud. Another advantage might be

increasing housing leaders' ability to implement strategies to deter the escalation in

subsidized housing costs. This approach would help to ensure funds remain available to

meet the housing needs of Americans living below the poverty level. Implications for positive social change included the potential for reducing or eliminating fragmentation, duplication, and overlapping of government programs. This strategy could increase federal funds for other important government public service departments, such as the U.S. Department of Defense and the U. S. Department of Homeland Security.

Role of the Researcher

The role of the qualitative researcher is to function as the primary instrument for the data collection process, serve as a mediator of data collected, and maintain strict adherence to ethical guidelines (Isaacs, 2014; Noble & Smith, 2015; Yin, 2014). I served as the primary research instrument in this qualitative study. In contrast to quantitative researchers, qualitative researchers have personal involvement with the participants and show empathy and understanding (Merriam & Tisdell, 2015; Marshall & Rossman, 2016; Townsend & Cox, 2013; Yin, 2014). Qualitative researchers typically show partiality and tell the story from an insider's point of view (Baškarada, 2014; Mortari, 2015; Noble & Smith, 2015). Qualitative researchers' narrative includes their interpretation and corroboration with the participants' point of view (Noble & Smith, 2015; Onwuegbuzie & Byers, 2014; Yin, 2014).

Researcher's Relationship with Topic and Participants

The quality of data collected is contingent upon a researcher's ability to garner proper knowledge about the topic (Merriam & Tisdell, 2015; Robinson, 2014; Yin, 2015). The qualitative researcher's position and life experiences will influence the interpretation of the stories participants tell and how they communicate them to the

researcher (Lewis, 2015; Wilkinson & Kitzinger, 2013; Yin, 2015; Zhu et al., 2015).

Based on 18 years of experience working as a PHA CEO at the same agency, and having

27 years of experience in federally subsidized rental housing programs, I am very

knowledgeable concerning the study phenomenon. Because of working in the housing

industry and attending networking events with colleagues, I have built a robust business

rapport with many of the prospective participants. I understand how to connect with the

prospective participants from the context from which they will communicate. I have

reflected, and received HUD training, on strategies to detect and eliminate tenant fraud in

the rental housing market. I have observed instances of fraud perpetrated by tenants,

PHA employees, and business owners of properties subsidized in the HCV program.

Therefore, I believe I was suitable and possessed adequate knowledge and experience to

serve as the primary research instrument for this study.

Miranda and Sanchez (2014), Musoba, Jacob, and Robinson (2014), and Yin

(2014) encouraged researchers to consider ethics when a prior relationship exists between

the researcher and participant. For any participants I had a prior working relationship, I

disclosed my personal bias and provided assurance that I would take extra precautions

during the interview to remain unbiased. To ensure I conducted research in an ethical

manner, I encouraged participants to share their personal insight and perspective of

implementing successful strategies to combat fraud in the HCV program.

The Belmont Report

The Tuskegee syphilis experiment served as a vital component to the launching of

ethics in biomedical research and the health profession (Chwang, 2014; George, Duran, &

Norris, 2014; Miranda & Sanchez, 2014). Because of the way doctors treated participants

in the Tuskegee syphilis study, the National Commission for the Protection of Human

Services of Biomedical and Behavioral Research prepared the report in 1978 (Davis,

2015; Miracle, 2016). The Federal Government approved this 20-page report in 1979.

The primary goal of the Belmont report was to identify essential ethical principles that

researchers should apply when studying human participants (Davis, 2015; Miranda &

Sanchez, 2014; Musoba, Jacob, & Robinson, 2014). The three basic ethical principles are

(a) beneficence, (b) justice, and (c) respect for persons (Chwang, 2014; Miracle, 2016;

U.S. Department of Health and Human Services, 2015). Because of the Belmont report,

leaders of research institutions established institutional review boards (IRB) to govern the

protection of human rights during research study and clinical trials (Friesen, Kearns,

Redman, & Caplan, 2017; Miracle, 2016; Musoba et al., 2014). As prescribed by the

Belmont Report, researchers should treat participants with confidentiality, respect, and

safety (Chwang, 2014; Miracle, 2016; U. S. Department of Health and Human Services,

2015).

Mitigating Researcher Bias

To ensure the data collected are trustworthy and accurate, researchers should

identify biases (Liedtka, 2015; Roulston & Shelton, 2015; Yin, 2014). Researchers'

personal lens can affect what they see, observe, note, and do not see during research

(Cope, 2014; Roberts, 2015; Shelton, Smith, & Mort, 2014). Researchers should be

aware of what creates bias and the level of influence of their background, culture, and

personal beliefs (Cope, 2014; Mortari, 2015; Ruivo, Santos, & Oliveira, 2014). Knowing

how to manage one's biases effectively can affect the outcome of a study (Liedtka, 2015; Meyer & Liu, 2014). Researchers should incorporate techniques to ensure the data collected are valid, reliable, and without the personal lens of the researcher (Meyer & Liu, 2014; Roulston & Shelton, 2015; Yin, 2014). Recognizing the foreknowledge and housing management experience garnered, along with formal HUD training, I was cognizant of my personal lens and worldview and identified personal biases. To add credibility and validity to the study, I maintained complete transparency and disclosure of my thoughts and experiences with participants by keeping a research journal. I noted several potential personal biases I considered in the Assumptions section of this proposal. Berger (2015), Leung (2015), and Smith and McGannon (2018) purported ways to mitigate personal bias include member checking, bracketing and journaling, and reflexivity.

Member checking. An important technique to mitigate researcher bias is to maintain appropriate body language that is neutral and that encourages participants to respond (Harvey, 2015). To address personal biases, I maintained neutral body language and direct eye contact during the interviews. To ensure accuracy in the record of my interpretation of what participants stated during interviews, I incorporated member checking. Member checking includes involving participants in transcript review, verifying the emerging themes, and making inferences by asking participants to offer reasons denoted in patterns (Birt, Scott, Cavers, Campbell, & Walter, 2016; Harvey, 2015; Thomas, 2016). I denoted central themes and concepts while recording, coding, and evaluating the data.

Bracketing and journaling. I used the process of bracketing, (Darawsheh, 2014; Johnston, Wallis, Oprescu, & Gray, 2017; Sohn, Thomas, Greenberg, & Pollio, 2017), separating personal experiences and perceptions, morals, and beliefs to mitigate bias. The method for achieving bracketing used in this study were annotating perceptions about best practices for combatting rental-housing fraud, and keeping memos during the data collection and analysis process. I used the journaling process as a technique to remain objective and aware of potential biases, which allowed me to focus on the participants' rich, thick description of the phenomenon. The use of a journaling process, keeping a detailed record of data collection, data analysis, and data reporting, is a means to mitigate personal bias (Bishop & Dzidic, 2014; Cope, 2014; Vicary, Young, & Hicks, 2017). Using the journaling process, the researcher focuses on the participants' rich, thick description of the phenomenon, and accurately obtains a construct of the participants' perspectives (Vicary et al., 2017).

Reflexivity. Reflexivity is the concept that individuals' environment inherently influences or biases their view of a subject (Band-Winterstein, Doron, & Naim, 2014; Ibrahim & Edgley, 2015; Mortari, 2015). Incorporating reflexivity serves as a quality control tool to counteract personal biases (Band-Winterstein et al., 2014; Ibrahim & Edgley, 2015; Mortari, 2015). Understanding that my societal status, personality, life experiences, and professional and political beliefs could potentially influence the study, I incorporated the strategy of reflexivity.

Interview Protocol

Interviews are useful for obtaining the story behind a participant's experiences and perceptions (Noordman, de Vet, van der Weijden, & van Dulmen, 2013). The primary focus of interviewing is to understand the meaning of what the interviewees communicate during the interview (Esteves, 2014; Lewis, 2015; Yin, 2014). Alsaawi (2014), Noble and Smith (2015), and Robinson (2014) suggested using an interview protocol to sustain the researcher and participant's focus during the interview and aid with mitigating the risk of personal bias. An interview protocol consists of a list of semistructured questions, an interview script, and a consent form to gain signed consent from participants (Esteves, 2014; House, 2013; Merriam & Tisdell, 2015). The strength of the general interview protocol approach is the researchers' ability to ensure they collect the same general areas of information from each interviewee (Doody & Doody, 2015; Hershkowitz, Lamb, Katz, & Malloy, 2015). I developed an interview protocol to preserve the integrity of the interview process of capturing the participants' delineation of successful strategies implemented for combatting tenant fraud in the rental housing market (see Appendix A). I followed the script of the interview protocol and listened attentively to remain neutral, objective, and mitigate personal biases.

Developing unbiased, open-ended interview questions will help steer the interviews with study participants in an objective manner (Liedtka, 2015; Robinson, 2014). I developed open-ended interview questions (see Appendix B) to guide the interviews in an unbiased manner and enhance credibility of the interviews.

Participants

The primary aim of qualitative research is to garner a greater depth of understanding of a phenomenon (Palinkas et al., 2015; Robinson, 2014; Yin, 2014). Participants should provide valuable and accurate information on interview questions to generate credibility of the study phenomenon (Alshenqeeti, 2014; Cleary et al., 2014; Gentles et al., 2015). Researchers should use criteria to select suitable study participants to satisfy the goals and objectives fundamental to the research method (Doykos, Brinkley-Rubinstein, Craven, McCormack, & Geller, 2014; Gentles et al., 2015; Palinkas et al., 2015; Seitz, 2016). To ensure researchers address the overreaching research question, the eligibility requirements of participants should include individuals with experience and knowledge of the phenomenon studied (Alsaawi, 2014; Cleary et al., 2014; Yin, 2014). Gentles, Charles, Ploeg, and McKibbon (2015) contended that participants should have knowledge and experiences related to the phenomenon to allow researchers to gain insight of the study focus.

Participant Eligibility Criteria

Participants of this study possessed ample knowledge and experiences to answer the overreaching research question: What strategies do business executives and owners use to detect and eliminate tenant fraud in subsidized rental housing? The key eligibility criteria for study participants included being knowledgeable and experienced with HCV program administration, and having experience with implementing successful strategies to detect and mitigate tenant fraud in the rental housing market. Participant criteria included being knowledgeable, have direct experience with the HCV program and

implementing strategies to combat tenant fraud, and employed currently or formerly as an executive manager with a PHA in the central Florida region. Executive management was comprised of employees serving in the role of president/chief executive officer (CEO), executive director, deputy director, compliance officer or director, and HCV director or manager.

Gaining Access to Participants

After receiving the required approval from members of Walden University's IRB, I began the identification of participants meeting the established criteria. I adhered to all protocols established by the Belmont Report and the IRB. The process of gaining access to the participants and meeting the ethical requirements of the IRB included contacting prospective participants located in the target area of central Florida. I selected six participants from three PHAs in central Florida for the study.

As of April 2017, there were 61 PHAs in the state of Florida, and approximately 3,300 PHAs in the U.S. (U. S. Department of HUD, 2017). The majority of the PHAs in Florida are members of the Florida Association of Housing and Redevelopment Officials (FAHRO), a Florida-based housing industry professional association (FAHRO, 2017). FAHRO's main objective is to provide a network for its membership base to exchange information and receive professional development training to enhance low-income and affordable housing and community development services (FAHRO, 2017). FAHRO's membership base in December 2016 consisted of approximately 200 Florida-based PHAs, community development organizations, and associate members (FAHRO, 2017). The

member agencies of FAHRO collaborate to promote safe, sanitary, clean, and affordable housing opportunities and services for the citizens of Florida (FAHRO, 2017).

As a 19-year member of FAHRO, I had established an extensive network of colleagues and built a professional rapport that aided with accessing participants for the study. The FAHRO membership directory provided contact information to access executive management employees of the three-targeted PHAs located in central Florida. Considering I have established a strong rapport with many Florida PHA colleagues during my tenure as a PHA CEO, I made initial contact directly with PHA executive management telephonically. Doykos, Brinkley-Rubinstein, Craven, McCormack, and Geller (2014) advocated for researchers initially accessing participants telephonically to begin the bonding process.

The initial telephone call included an introduction and brief highlight of my professional background, information regarding the study objectives and benefits, and a presentation of participant eligibility questions. I inquired of the prospective participant's interest in participating in the study. I ensured the participant understood participation was voluntary, and I discussed methods for withdrawing from the study. During the initial contact, it is important for researchers to share their identity with prospective participants, along with contextual information related to researcher's work experience and training (Lewis, 2015; Mueller & Segal, 2015). When making the initial contact, researchers should share information about the study and present key questions to the participants to determine eligibility as a study participant (Burchett, 2014; Lewis, 2015; Noble & Smith, 2015).

After the introductory telephonic discussion with PHA management, I followed up with an email to participants meeting the preliminary eligibility criteria. The follow-up email encompassed an expansion of the study discussion, expectations, a depiction of participant and researcher roles, and time commitment estimates. I reminded participants that participation was voluntary, and I explained the method for withdrawing from the study. In this globalizing world, e-mail has become an acceptable method to contact participants to apprise them of the purpose and plans of a qualitative research study (Burchett, 2014; Hunter, Corcoran, Leeder, & Phelps, 2013; Lewis, 2015).

To achieve a mixed balance of race, gender, level of expertise and knowledge, and location, some researchers recruit participants using email (Hunter et al., 2013; Lenters, Cole, and Godoy-Ruiz, 2014; Lewis, 2015). Correspondence should include adequate information so the participants can render an informed decision about whether they would consent to participating in the study (Burchett, 2014; Hunter et al., 2013; Lenters et al., 2014; Robinson, 2014). Alsaawi (2014), Alshenqeeti (2014), and Yin (2014) suggested accessing participants located in close proximity for ease of access for in-person interviews.

I requested from each of the selected eligible PHA participants, a list of their respective agency's business owners of properties subsidized in the HCV program. I explained that the primary filter for determining eligibility of business owners included those owners who had detected and reported tenant fraud to PHA staff. All participants declined sharing contact information for business owners of properties subsidized in the HCV program for confidentiality reasons.

Building Rapport with Participants

Hershkowitz, Lamb, Katz, and Malloy (2015) asserted enhanced rapport building with participants might alter the dynamics of the interview in favor of greater cooperation. Understanding a participant's history with a phenomenon and demonstrating empathy and genuine concern can lead to increased rapport building with participants (Alshenqeeti, 2014; Doykos et al., 2014; Pietkiewicz & Smith, 2014). Researchers can place participants at ease with participating in a study by treating them with respect, maintaining confidentiality, and explaining the intent of the study in detail (Burchett, 2014; Hershkowitz et al., 2015; Musoba et al., 2014; Yin, 2014). Various instruments exist to place study participants at ease and build rapport, which is important when recruiting participants, such as skype interviewing and using FaceTime (Deakin & Wakefield, 2014; Doykos et al., 2014; Janghorban, Roudsari, & Taghipour, 2014; Seitz, 2016).

Alignment of Participant Characteristics with Research Question

When selecting participants, their characteristics should align with the overreaching research question (Doykos et al., 2014; Gentles et al., 2015; Palinkas et al., 2015; Yin, 2015). Morse (2015), Robinson (2014), and Yin (2014) purported participants should be selected based on their knowledge about the topic and ability to add information of value to the study. I selected participants based on their in-depth knowledge and work experiences in the HCV program and experience with implementing fraud mitigation strategies, to answer the overreaching research question: What strategies do business executives and owners use to detect and eliminate tenant fraud in subsidized

rental housing? Using the study participant eligibility criteria of being knowledgeable,

and having direct experience with the HCV program and implementing strategies to

combat tenant fraud, ensured study participants aligned with the overreaching research

question.

Research Method and Design

The research problem and questions are factors to consider when determining the

research method and design (Landrum & Garza, 2015; Lewis, 2015; Yin, 2014).

Selecting the appropriate research method and design is paramount to producing factual

research findings (Bell, 2014; Corley & Hamilton, 2013; Ioannidis et al., 2014; Quick &

Hall, 2015). Engaging in inconsistent analyses might also skew research outcomes

(Burchett, 2014; Ioannidis et al., 2014; Yin, 2014). Quantitative, qualitative, and mixed

methods are the three primary types of research methods (Hair et al., 2015; Landrum &

Garza, 2015; Makrakis & Kostoulas-Makrakis, 2016; Quick & Hall, 2015).

Research Method

I selected a qualitative research method for this study to explore strategies

business executives use to detect and eliminate tenant fraud in the rental housing market.

According to Alsaawi (2014), Marshall and Rossman (2014), and Baškarada (2014),

researchers employing qualitative research focus on issues that are ambiguous and

impossible to measure accurately. A qualitative research method was suitable for my

study because, according to Ellen (2018), French and Ruiz (2011), and Huth (2104),

rental housing market fraud is impossible to measure accurately and precisely.

Qualitative researchers use inductive reasoning to synthesize interpretation of the

interactions and actions of participants (Ashworth, 2015; Lewis, 2015; Norreklit, 2014).

Participants of the study provided rich, thick, descriptive data from their perceptions and

experiences with mitigating tenant fraud in the rental housing market. Relying on the

interactions and actions of participants and incorporating their rich, thick, descriptive

perceptions to substantiate study findings, made the qualitative research method more

suitable for the proposed study.

Qualitative Research Method

The qualitative researcher analyzes data such as words, phrases, or sentences in a

natural setting to formulate conclusions (Alsaawi, 2014; Johnson, 2015; McCusker &

Gunaydin, 2015). Qualitative research is subjective and refers to a social life (Alsaawi,

2014; Burchett, 2014; Marshall & Rossman, 2014; Yin, 2014). Researchers use a

qualitative research method to garner broad and detailed insight of individuals'

experiences, beliefs, and emotions (Ashworth, 2015; Hazzan & Nutov, 2014; Tong,

Winkelmayer, & Craig, 2014; Townsend & Cox, 2013). From the subjective information

derived from participant interviews, I explored strategies used to combat tenant fraud in

the rental housing market, which makes qualitative research a more appropriate method to

use. Researchers used the qualitative research method to study a fraud case involving the

chairperson and founder of Satyam Computers Limited, the fourth largest company in

India (Bhasin, 2016). The chairperson and founder overstated assets by $1.47 billion to

reflect fraudulent profits that resulted in unearned bonuses for executive management

(Bhasin, 2013). Baškarada (2014), Beail and Williams (2014), and Roy, Zvonkovic,

Goldberg, Sharp, and LaRossa (2015) described qualitative research as a deficient

research method because of the researcher's personal interpretations. The limited number of participants is another deficiency of the qualitative research method and makes it difficult to generalize qualitative findings to a large group (Baškarada, 2014; Beail & Williams, 2014; Cleary et al., 2014).

Other Research Methods

Unlike quantitative researchers, qualitative researchers use the participant's rich and descriptive response from a personal and subjective perspective (Abdinnour & Saeed, 2015; Burchett, 2014; MacGregor & Wathen, 2014). In contrast to quantitative research, the researcher is the instrument of qualitative research and synthesizes human experiences (Morse, 2015; Mortari, 2015; Parker, 2014; Tong et al., 2014). One of the fundamental differences between quantitative and qualitative research is the qualitative researcher directly influences the findings (Hafford-Letchfield, 2014; McDermid et al., 2014; Roulston & Shelton, 2015). I served as the instrument of research and I directly influenced the findings based on my interpretation of the actions and interactions of the participants. My interpretation of the participants' personal insights on the phenomenon of the best strategies to mitigate tenant fraud in the rental housing market directly influenced findings.

Quantitative research method. Quantitative researchers' primary concern is quantifying a phenomenon with an objective of testing a hypothesis or exploring causal relationships by the development of statistical models (Barnham, 2015; Hunt, 2014; Landrum & Garza, 2015; McCusker & Gunaydin, 2015). In contrast to qualitative researchers, quantitative researchers use deductive analysis to generate numerical

conclusions to substantiate the rejection or acceptance of the null hypothesis (Barnham, 2015; Hair et al., 2015; Makrakis & Kostoulas-Makrakis, 2016; McCusker & Gunaydin, 2015). Quantitative researchers focus on statistical analysis to determine results, while qualitative researchers rely on shared information from participants (Alsaawi, 2014; Barnham, 2015; Hagan, 2014). Quantitative researchers rely on variables to analyze a phenomenon and do not seek additional information after rejecting or accepting the null hypothesis (Barnham, 2013; Hair et al., 2015; McCusker & Gunaydin, 2015). The quantitative research method was not appropriate for this study because I did not rely on variables to analyze strategies used to combat fraud in the rental housing market.

The focus of quantitative research is theory driven on two strategies of inquiry: nonexperimental research and experimental research (Barnham, 2015; Hair et al., 2015; Hunt, 2014). Nonexperimental or survey researchers use a numeric description of attitudes, trends, or opinions of a group by examining a section of the group (Baškarada, 2014; Hair et al., 2015; Quick & Hall, 2015). Experimental researchers focus on evaluating one or more variables to determine whether a distinct action influences an outcome (Hair et al., 2015; McCusker & Gunaydin, 2015; Quick & Hall, 2015). I did not incorporate the quantification and analysis of factors in this study; I based my findings on assumptions rather than theory. The study did not incorporate a hypothesis prior to collecting data. Consequently, I chose a qualitative method over a quantitative research method for the study.

Mixed methods research. The mixed methods approach was not a suitable research method for exploring strategies to combat tenant fraud in the rental housing

market. In addition to incorporating the aspects of qualitative research, researchers engaging in mixed methods research use numerical data for hypothesis testing to examine a particular phenomenon (Hafford-Letchfield, 2014; Hussein, 2015; Quick & Hall, 2015). A mixed methods researcher will collect and analyze quantitative and qualitative data, which will serve to cancel any biases from either method (Hafford-Letchfield, 2014; Lenters et al., 2014; Pfaff et al., 2014).

The three strategies of inquiry of mixed methods research include sequential, concurrent, and transformative (Hafford-Letchfield, 2014; Quick & Hall, 2015; Pfaff et al., 2014). Researchers using mixed methods research favor a hybrid mix of design elements (Hafford-Letchfield, 2014; Johnson, 2015; Quick & Hall, 2015), which did not fit as well within the scope of my study as a qualitative study. The qualitative component of mixed methods research method does not incorporate the rich, thick, descriptive data generated from the perceptions of participants as does the sole use of qualitative research (Hafford-Letchfield, 2014; Landrum & Garza, 2015; Quick & Hall, 2015). Findings from the study to explore strategies business executives use to combat tenant fraud in the rental housing market relied heavily on rich, thick, descriptive perceptions of participants. The study did not involve quantifying data; therefore, the quantitative and mixed methods research was not suitable. Time constraints for the study and the complexity of mixed methods research were also reasons I did not choose the mixed methods approach.

Research Design

When selecting a research design, the value and usefulness of the outcomes should receive consideration (Ioannidis et al., 2014; Lewis, 2015; Yin, 2014).

Researchers use research design to link the elements of research used when exploring the overreaching research question to cultivate suppositions (Hunt, 2014; Isaacs, 2014; Yin, 2014). Qualitative research design includes narrative, phenomenology, ethnography, grounded theory, and case study (Isaacs, 2014; Nie, 2017; Strauss & Corbin, 2015). I selected a case study design for the study. I incorporated elements of the research design for identifying methods business executives of PHAs use to combat tenant fraud in the rental housing market.

Case Study Design

While qualitative researchers use single-case study design when studying a phenomenon using an individual or group, multiple case study design involves multiple cases associated with a phenomenon (Dasgupta, 2015; Koivu & Hinze, 2017; Ridder, 2017). I used a multicase study design to explore leadership strategies of detecting and eliminating tenant fraud in the rental housing market, specifically the HCV program. I examined the phenomenon from the perspective of executive management staff of several PHAs.

Case study design substantiates the extensive exploration of a particular phenomenon and facilitates the investigation and depiction of the phenomenon in a specific context (Cope, 2014; Hazzan & Nutov, 2014; Isaacs, 2014; Robinson, 2014; Yin, 2015). Dasgupta (2015), De Massis and Kotlar (2014), and Hazzan and Nutov (2014) justified the use of case study design because it uses rich and thick data to study a phenomenon from a real-life aspect. Dasgupta (2015), Koivu and Hinze (2017), Ridder (2017), and Parker (2014) denoted a case study is the preferred research design when

exploring a distinctive paradigm incorporating research of a specific occasion or program. Koivu and Hinze (2017), Morse (2015), and Nie (2017) advocated using case study design when the focus is to study a phenomenon in a real-life setting and provides clarity of a complex phenomenon. The goal of the study was to ensure comprehension of the complexity and foundation of a special phenomenon, fraud in the rental housing market, in a real-life context.

Other Research Designs

Other research designs would not have adequately supported the rich case exploration and description I desired for the study. According to Bevan (2014), Hunt (2014), and Quick and Hall (2015), researchers using the phenomenological research design, study the significance of lived experiences of a group of individuals. Researchers using the phenomenological research design focus data collection on individual perceptions gathered solely from interviews (Bevan, 2014; Hunt, 2014; Peyrovi et al., 2014; Quick & Hall, 2015). Phenomenological researchers ignore information collected from other sources, such as archived data and reports (Hunt, 2014; Peyrovi et al., 2014; Pfaff et al., 2014).

In addition to interviews, I used information I collected from archived data and reports, which the phenomenological research design ignores all sources other than interviews. Using the phenomenological research design would have reduced the intent of this study. The narrative research design did not align appropriately with the scope of the study. The primary concern of a researcher using the narrative design is to tell a story

and communicate the information in a narrative or chronological timetable (Dena, 2017; Pringle, 2016; Roberts, 2015), which was not the intent of this study.

Application of an ethnographic study design is most suitable for examining a culture-sharing group with similar behaviors and beliefs (Comi & Whyte, 2018; Conn, Nathens, Soobiah, Tien, & Haas, 2018; Sercu, Ayala, & Bracke, 2015). Fujii (2015), Leung (2015), Strauss & Corbin (2015) suggested the intent of ethnographic research includes examination of the society or cultural descriptions. The ethnographic study design was not a design focus that aligned with my study because I did not examine strategies to combat tenant fraud from a cultural or societal aspect. Amsteus (2014), Lewis (2015) and Nie (2017) depicted grounded theory design as the development of new frameworks beyond descriptions of lived experiences. Researchers engaging in the grounded theory research design formulate new theories solely based on interviews and observations (Khan, 2014; Lo, 2014; Nie, 2017). The grounded theory design was not appropriate for my study because developing new theories was not the objective.

Data Saturation

Data saturation is a process of achieving credibility of research through the exhaustion of information available on a specific topic (Boddy, 2016; Cope, 2014; Penderson, Hack, McClemont, & Taylor-Brown, 2013). Finfgeld-Connett (2014), Malterud, Siersma, and Guassora (2015), and Leung (2015) contended that data saturation is a critical element in the selection of participants for qualitative research. Researchers achieve data saturation when they have gathered enough data to replicate the study without obtaining additional information (Boddy, 2016; Goldberg & Allen, 2015;

Hazzan & Nutov, 2014). Selection of the appropriate research design promotes data saturation (Boddy, 2016; Goldberg & Allen, 2015; Penderson et al., 2013). Researchers reach data saturation when they cannot obtain any new information and cannot justify any new themes or coding (Boddy, 2016; Cope, 2014; Goldberg & Allen, 2015; Penderson et al., 2013).

An accepted method to obtain data saturation is a two-step process Boddy, 2016; Goldberg & Allen, 2015; Hazzan & Nutov, 2014; Malterud, Siersma, & Guassora, 2015). To apply this method, researchers select a minimum sample size from the literature. If data saturation takes place, then the second step involves two more interviews (Boddy, 2016; Cleary et al., 2014; Goldberg & Allen, 2015; Hazzan & Nutov, 2014; Malterud et al., 2015). If need be, researchers should repeat Step 2 until they achieve data saturation (Boddy, 2016; Elo, Kääriäinen, Kanste, Pölkki, Utriainen, & Kyngäs, 2014; Penderson et al., 2013). I applied the two-step technique and began with a sample size of six participants. Once no new ideas emerged, the interviewing ceased for my study because I had reached data saturation, and I did not continue to step 2. I listened attentively and paid careful attention to participant responses to determine the point when responses became redundant and to cease gathering interview data.

Population and Sampling

The population for this study was six executive managers currently or formerly employed with PHAs located in central Florida. Participants came from PHA executive management having responsibility for the administration of HCV program operations and staff, and experience implementing strategies to mitigate fraud.

The central Florida region encompassed the counties of Marion, Sumter, Lake, Seminole, Orange, Osceola, Polk, Pasco, Hardee, and Highlands (State of Florida, 2017). Due to my responsibility as CEO of the PHA that serves Marion County, I did not include Marion County as a part of the targeted population, but instead replaced it with a different county. I selected six participants from three PHAs located in central Florida.

According to Cleary, Horsfall, and Hayter (2014), primary principles of participant selection in qualitative research include the following:

- Researchers evaluate small sample sizes carefully.

- Researchers select participants on a purposeful basis.

- The theoretical framework influences participant selection conceptually.

- Researchers typically conduct participant selection sequentially.

- A valid reasoning for participant selection is critical.

Types of Sampling Methods

Landau and Stahl (2015), Robinson (2014), and Roy et al (2015) noted sampling includes data composition and ensuring the sample is suitable for the project theory. Primary types of sampling methods include probability, quota, selective (nonprobability), convenience, and ethnographic sampling (Cleary et al., 2014; Robinson, 2014; Yin, 2014). Three common types of qualitative sampling methods include purposeful, quota, and snowballing sampling (Cleary et al., 2014; Malterud et al., 2015; Roy, Zvonkovic, Goldberg, Sharp, & LaRossa, 2015).

Selected Sampling Methods

I used the purposeful sampling method to select participants for the qualitative

multicase study on exploring strategies business executives use to detect and eliminate

tenant fraud in the rental housing market. At the end of the interview process and

documents review, I had achieved data saturation from use of the initial six study

participants.

Researchers engaging in theoretical and purposeful sampling allow the data

collection process to determine the sample selection (Cleary et al., 2014; Robinson, 2014;

Roy et al., 2015). Wilson (2014) described a purposeful sample as a non-probability

sample a researcher identifies contingent upon attributes of the selected population and

study objectives. Purposeful sampling is a nonprobability method that involves the

researcher purposely selecting participants who have knowledge and expertise about the

study phenomenon (Barratt et al., 2015; Benoot, Hannes, & Bilsen, 2016; Robinson,

2014; Yin, 2014). However, Alsaawi (2014), Zhu, Barnes-Farrell, and Dalal (2015), and

Yin (2014) warned that nonprobability sampling does not provide an opportunity for all

elements of the population to have a known probability of the researcher selecting. Zhu

et al (2015) labeled purposive sampling as subjective, selective, or judgmental.

Qualitative researchers generally use purposeful sampling in the selection of participants

when proportionality is not required (Barratt et al., 2015; Benoot et al., 2016; Palinkas et

al., 2015). Kaczynski, Salmona, and Smith (2014), Robinson (2014), and Yin (2014)

concurred with other researchers that purposeful sampling is the dominant type of

sampling for a qualitative research case study. The use of snowballing sampling allows

eligible participants to select additional participants, using the eligibility criteria, to supplement the study (Benoot et al., 2016; Gentles et al., 2015; Tong et al., 2014)

Study objectives included collecting data from administrative documents, HUD supplemental reports used by participants, internal audits, and participants having expansive knowledge of the structure and regulatory guidelines of the HCV program, and experience of monitoring program fraud. Successful identification of the fraud mitigation strategies required intentional selection of participants having the ability to share accurate information on the phenomenon. Therefore, purposeful sampling was a suitable method for participant selection for the study on exploring strategies business executives have used to combat tenant fraud in the rental housing market. Participants working in the administration of the HCV program having experience with implementing strategies to combat tenant fraud were to provide rich, thick, descriptive data to meet study objectives.

Sample Size

Sampling encompasses determining the correct sample size and selecting the appropriate sample to protect and enhance the integrity of the study's objectives (Malterud et al., 2015; Robinson, 2014; Roy et al., 2015). Research sampling size varies based on the research question and the purpose of the research criteria (Boddy, 2016; Palinkas et al., 2015; Robinson, 2014). The proposed study consisted of six participants.

Qualitative research methods rely on previous research models for determining an appropriate number of participants to use (Doykos et al., 2014; Palinkas et al., 2015; Robinson, 2014; Yin, 2014). The selection and sample size of qualitative research participants are contingent on research objectives, credibility, and usefulness of the

research and on risk factors (Cleary et al., 2014; Elo et al., 2014; Malterud et al., 2015).

Qualitative researchers select participants who can provide a diverse perspective and

expansive understanding of their respective perspectives (Boddy, 2016; Cleary et al.,

2014; Malterud et al., 2015).

Key elements of determining appropriate sample size include sample adequacy

and ample data saturation (Cleary et al., 2014; Elo et al., 2014; Malterud et al., 2015;

Rubin & Rubin, 2012). Qualitative researchers achieve balance during the interview

process when the number of participants selected is adequate to ensure diversity (Cleary

et al., 2014; Malterud et al., 2015; Rubin & Rubin, 2012). A small sample size consisting

of 10 or fewer participants is characteristic of a qualitative study conducted to gain insight

into a complex phenomenon (Cleary et al., 2014; Landan & Stahl, 2013; Robinson, 2014;

Yin, 2014). The recommended sample size for a case study is between two and six

participants (Malterud et al., 2015; Robinson, 2014; Yin, 2015). However, Yap and

Webber (2015) used 20 participants in a case study to explore the corporate culture.

Robinson (2014) purported the ultimate sample size for qualitative research occurs when

the researcher achieves data saturation. The sample size of six was appropriate for this

study.

Data Saturation

Data saturation is the point in the data collection process where the researcher

ceases to identify any new concepts, codes, or themes, and can replicate the study with

existing data (Boddy, 2016; Elo et al., 2014; Malterud et al., 2015). To achieve data

saturation, Yin (2014) suggested one participant per case study. However, Landan and

Stahl (2013), Malterud et al (2015), and Robinson (2014) contended a direct correlation does not exist between sample size and data saturation. Researchers should explore the greatest amount of literature possible that will yield relevant information (Cleary et al., 2014; Hazzan & Nutov, 2014; Penderson et al., 2013).

I began with the interview of six participants and did not need to add additional participants, because the information became repetitive and redundant, which resulted in data saturation. Employing use of data triangulation techniques, comprised of audio recordings of semistructured interviews, member checking, and review and analysis of archived documents and reports, aided in reaching data saturation for this study. Listening assiduously to responses helped to facilitate the determination of when participant responses become redundant, and I had reached data saturation.

Participant Selection Criteria

Study participants were required to meet the following selection criteria: (a) knowledgeable and experienced with HCV program administration and (b) having experience with implementing successful strategies to combat tenant fraud in the rental housing market. Additionally, the selected participants were required to have direct work experience, currently or formerly, employed as a manager with a PHA. All participants were located in central Florida region.

Interview Setting

Researchers should carefully select sites of participants who can identify the research problem and the phenomenon under study (Elo et al., 2014; Kaczynski, Salmona, & Smith, 2014; Yin, 2014). The characteristics of qualitative research interview setting

include a natural, nonthreatening environment, such as the site where participants work (Hazzan & Nutov, 2014; Morse, 2015; Yin, 2014). Ibrahim and Edgley (2015), Lewis (2015), and McDermid, Peters, Jackson, and Daly (2014) contended a researcher's prior working relationship might cause the participants to feel pressured to participate, regardless of their respective comfort level. For best results, qualitative researchers should select an interview site that is private and minimizes interruptions, and is conducive for the participants to relate and respond to the research problem freely (Ibrahim & Edgley, 2015; Jacobs & Furguson, 2012; Qnwuegbuzie & Byers, 2014). De Massis and Kotlar (2014), Lewis (2015), and Leung (2015) advocated researchers using a quiet, neutral venue of the participant's choice, for case study interviews. I offered participants the freedom to select the interview site for the study that would ensure they were comfortable and could speak privately and confidentially. For any participants who did not have a preference, recommended their respective office, or a public library or park located in close vicinity of their office for participants' convenience. I reiterated to participants that the interview locale should have attributes of a quiet, private, and confidential environment. All participants chose their respective office for the interview site.

Ethical Research

Ethics is an ongoing fortitude of moral principles that dictates conduct and considers all pertinent information, standards, and current and future impacts on all stakeholders of society (Moorthy et al., 2015; Musoba et al., 2014; Ruivo et al., 2014). The concept of ethics requires high-integrity decision making. Ethical issues have been a

challenge for researchers for centuries (Bradley, 2015; Musoba et al., 2014; Ruivo et al.,
2014). Researchers must adhere to protecting the rights and confidentiality of
participants, and remain compliant with the requirements of the ethical protocol of the
Belmont Report (Davis, 2015; Miracle, 2016; U. S. Department of Health & Human
Services, 2015). The fundamental ethical principles of the Belmont Report include
informed consent, benefits, risks analysis, and the participant selection process (Davis,
2015; Miracle, 2016; Yin, 2014).

Informed Consent

Members of the Walden University's IRB are responsible for reviewing and
ensuring submitted doctoral proposals meet Walden University's required professional
conduct and regulations for the study. Walden University's IRB has requirements
established to ensure minimal risks for doctoral studies. Researchers must obtain
informed consent from participants to protect their confidentiality and promote integrity
of the study (Burchett, 2014; Musoba et al., 2014; Van Wijk, 2014). According to the
ethical principles of the Belmont Report and requirements of the IRB, researchers must
receive participant's written consent to participate, prior to the onset of an interview
(Davis, 2015; Hershkowitz et al., 2015; Owens, 2014).

I submitted the informed consent form and Invitation to Participate letter, via
email, to potential participants meeting eligibility criteria. The informed consent form
included the study topic, objectives, and benefits, expected roles, time commitment
estimates, the process for withdrawing, and assurance that participation was voluntary.
Participants executed his or her agreement to participate in the study on the informed

consent form. The Invitation to Participate letter (see Appendix C) included the basis of

the research study and invited the participants to consider participating in the study

project by following the instructions in the informed consent form. I reiterated to

participants on the Invitation to Participate letter and the informed consent form that they

had the autonomy to consent or reject participation in the study.

Withdrawal Options

The informed consent form must contain an option to withdraw from the study

without any penalties, and outline the procedures for withdrawing (Morse, 2015; U. S.

Department of Health and Human Services, 2015; Van Wijk, 2014). It is the

responsibility of the researcher to ensure participants understand the informed consent

form prior to signing, and that participants understand the study protocol and logistics and

the method for withdrawing (Miracle, 2016; Morse, 2015; U. S. Department of Health

and Human Services, 2015; Van Wijk, 2014). The informed consent form for the study

included a statement that participants may withdraw from the study at any time, without

any explanation to the researcher, penalties, or repercussions. The informed consent form

outlined the methods of withdrawal from the study, including telephonic, email, or the U.

S. postal service. If any participant had notified me of his or her desire to withdraw from

the study, I would have acknowledged receipt of withdrawal notice within 48 hours, via

telephone and email. However, no participants withdrew from the study.

Study Participation Incentives

Benoot, Hannes, and Bilsen (2016), Silverman (2016), and Underhill (2014)

cautioned that financial incentives should not be inconvenient or coercive to study

participants. Mantzari, Vogt, and Marteau (2014) debated that the greater the financial incentives offered to participants, the higher probability of participation and participants closely reviewing research information. However, Robinson (2014) argued financial incentives might entice participants to provide fictitious responses. Other than subjective verbal and written acknowledgment of appreciation, I did not offer the participants any incentives in exchange for participation.

Ethical Protection of Participants

In accordance with the ethical protocols of the Belmont Report, researchers must store data on a password-protected computer hard drive in a home library, and shred data five years after study completion (Davis, 2015; Miracle, 2016; Morse, 2015; U. S. Department of Health and Human Services, 2015).

Confidentiality. To ensure privacy and protect the confidentiality of participants, I followed the requirements of the Belmont Report ethical protocols. I stored signed informed consent forms, interview transcripts, and interview recordings in a locked, secured home file cabinet, and I will shred five years after study completion. I stored all electronic data on a secure password-protected home computer that only I can access, and I will erase data after five years. In addition, I stored a backup copy of electronic data on a USB flash drive, with all files password-protected. I stored the USB flash drive in a secure, locked storage cabinet in my home with access limited to me. Following five years after study completion, I will shred all stored informed consent forms, interview transcripts, interview recordings, and other collected documents, and I will erase electronic data.

Pseudonyms. In accordance with the IRB requirements and the Belmont Report,

researchers must protect the privacy and confidentiality of participants (Bledsoe, Russell-

Einhorn, & Grizzle, 2017; Friesen et al., 2017; Miracle, 2016; U. S. Department of Health

and Human Services, 2015). As a measure to protect the privacy and confidentiality of

participants, some researchers incorporate the use of pseudonyms into the study that they

keep confidential (Bledsoe et al., 2017; Davis, 2015; Miracle, 2016). Researchers can

protect the identity of participants with an alphanumeric sequence (Allen & Wiles, 2015;

Bledsoe et al., 2017; Yin, 2014). I referenced participants and their respective

organizations in the study using an alphanumeric sequence. For example, I referred to the

first participant interviewed as "PH1A" to respect and retain the privacy and

confidentiality of the participant's identity. I referred to the second participant

interviewed of the first PHA as "PH1B", and third participant interviewed of the first

PHA as "PH1C". To maintain privacy and confidentiality, I referenced the fourth

participant, whom was from the second PHA, as PH2A. As per Walden University's IRB

regulations, and to respect participant privacy, final publication of the study will not

include names of participants or their respective organizations.

Walden IRB approval number. Once approved, the Walden University IRB

issued approval number 10-25-17-0502865 for the study. Lewis (2015), Morse (2015),

and Robinson (2014) encouraged researchers to offer participants the opportunity to

review or receive the results of the study. Subsequent to a final approval, I will send

participants a personal invitation letter to discuss study findings or receive an electronic

copy of a summary of study findings.

Data Collection Instruments

The researcher serves as the primary data collection instrument and interpreter of data collected in qualitative research (Hafford-Letchfield, 2014; Hazzan & Nutov, 2014; Kennedy-Clark, 2013; Yin, 2014). As the researcher, I served as the primary data collection instrument for the qualitative study. The six primary forms of data instruments used in a case study are direct observation, interviews, participant observation, archival records, physical artifacts, and documents (Cope, 2014; Morse, 2015; Nordvik, 2015). Ridder (2017) argued that researchers should reuse existing data collection instruments or develop new instruments. The secondary data collection instruments included an interview protocol, journal, and digital voice recorder.

Description of Data Collection Instruments

The primary data sources for the study were semistructured interviews. Secondary data sources included archival source documents, such as new hire reports, multiple subsidy reports, and income discrepancy reports. Additional archival source documents included Enterprise Income Verification (EIV) reports, deceased tenants' reports, and internal audit checklists. Agency internal control policies, procedures, and HCV administrative policies also represented secondary data source documents used in the study.

The three primary types of qualitative research interviews are structured, semistructured, and unstructured (Lewis, 2015; McCusker & Gunaydin, 2015; Noble & Smith, 2015). Using an interview protocol (see Appendix A), I collected data from

semistructured interviews using eight open-ended questions (see Appendix B) in face-to-face interviews of participants.

Use of Data Collection Instruments

Semistructured interviews consist of several key questions that help to define areas to explore and in which the interviewer or interviewee can deviate to pursue an idea or response in detail (Leung, 2015; Mueller & Segal, 2015; Noble & Smith, 2015). Moreover, semistructured interviews are suitable for the study to explore experiences and perceptions business executives and owners have of strategies for combatting tenant fraud in the rental housing market. The use of semistructured interviews encouraged the exchange of follow-up questions to garner better understanding of responses to the interview questions, enhance trust, and develop better rapport during the discussion of any sensitive information.

Ahn, Cox, London, Cekic, and Zhu (2014), Lewis (2015), and Perkins, Burton, Dray, and Elcock (2013) advocated researchers use an interview protocol to create uniformity and reliability of the interview process. I developed an interview protocol to maintain consistency during the interview process of encapsulating the participants' depiction of successful strategies for mitigating tenant fraud in the rental housing market (see Appendix A). I used archival source documents to answer the research question by substantiating the strategies participants shared to combat tenant fraud in the rental housing market.

Reliability and Validity of Data Collection Instruments

To enhance the reliability and validity of the data collection instruments used and mitigate personal bias, I incorporated bracketing prior to any data collection. Recognizing and identifying a researcher's personal lens before data collection will aid in narrowing the focus of the research (Noble & Smith, 2015). Darawsheh (2014), Leung, (2015), and Johnston, Wallis, Oprescu, and Gray (2017) described bracketing as the setting aside preconceived perceptions Darawsheh (2014) contended bracketing helps researchers validate study findings and mitigate personal biases. As bracketing depicts a particular framework to isolate impressions, feelings, and preconceived ideas from descriptions used during data collection, researchers should identify any personal assumptions regarding a topic (Darawsheh, 2014). I have identified several personal assumptions in the Assumption section of the study.

As a follow up to the interview process, I used member checking to enhance reliability and validity of the data instruments used in the study. Birt, Scott, Cavers, Campbell, and Walter (2016), Smith and McGannon (2018), and Thomas (2016) described member checking as involving study participants for review of researcher's interpretation of data and validation of emerging themes. Harvey (2015) and Merriam and Tisdell (2015) contended member checking is an avenue for participants to confirm the authenticity of interview data, and provides an opportunity for participant feedback. I interpreted what the participants stated, and I shared my interpretation with participants for validation.

Data Collection Techniques

The overreaching research question for this study was: What strategies do business executives use to detect and eliminate tenant fraud in subsidized rental housing? Data collection is an integral part of the research process for gathering information to answer research questions (Elo et al., 2014). It is critical to identify the scope, depth, and breadth of data collection processes during the preplanning phase of qualitative research (Burchett, 2014; Malterud et al., 2015; Robinson, 2014). Researchers use multiple sources of data for a qualitative case study (Lewis, 2015; Morse, 2015; Mueller & Segal, 2015). The principal methods to collect information in case study research are document analyses and interviewing participants to understand their point of view regarding the phenomenon to establish meaning (Lewis, 2015; Owen, 2014; Yin, 2014).

I received Walden University's IRB approval number 10-25-17-0502865 prior to beginning any collection of data. A pilot study was not applicable to the study. I used sources of data collected from semistructured face-to-face interviews of PHA executive management. The archival data retrieved from policies, procedures, reports, and audits from executive management of the selected PHAs substantiated tenant fraud and fraud mitigation strategies reported by the PHA executive management. The collected data answered the research question by revealing strategies business executives used to detect and minimize tenant fraud.

The data collection techniques for the study included digitally audio-recorded face-to-face interviews, researcher observations, and note taking. I used a RCA digital voice recorder to record the interviews. Audio recording interviews are necessary for

transcript accuracy (Berazneva, 2014; Cope, Mavroveli, Bezemer, Hanna, & Kneebone, 2015; Neal, Neal, VanDyke, & Kornbluh, 2015). Note taking is a means to describe nonverbal communications and to collect information on behavioral observations and impressions (Freeman et al., 2014; Miller & Dorman, 2014). All participants were able to participate in face-to-face interviews. Therefore, I did not need to incorporate Skype for the interview process.

Interview Protocol

The participants were allowed to select the interview date, time, and place. Alsaawi (2014) recommended five stages for face-to-face interviews, introductory, preparation, main context, cool-off, and closing summary. I mirrored Alsaawi's (2014) recommended interview protocol (see Appendix A). Bishop and Dzidic (2014), Tufford and Newman (2012), and Yin (2014) recommended researchers use field notes and a journal to capture information during interviews and observations. I incorporated the journaling process and field notes to capture audio and visual aspects of the interview, and mitigate personal biases.

Developing interview questions includes establishing the primary research topic, articulating the research goals, and developing the initial probe questions, targeted concept questions, follow-up questions, and wrap-up questions (Esteves, 2014; Hershkowitz et al., 2015; Lewis, 2015; Noble & Smith, 2015). Pringle (2016) explained that researchers use open-ended questions for interviews to formulate opinions and determine relevancy. According to Ibrahim and Edgley (2015), Noordman, de Vet, van der Weijden, and van Dulmen (2013), researchers use open-ended questions to encourage

participants to convey his or her knowledge on a topic with rich, thick, descriptive explanation. Elo et al. (2014), Lewis (2015), and Noble and Smith (2015) denoted the advantages of using open-ended research in qualitative research included: (a) the questions might foster encouragement of detailed answers in response to questions; and (b) the questions might provide an opportunity for the researcher to identify the participant's beliefs, opinions, habits, and attitudes. Researchers typically do not script open-ended questions, which aid the researcher with gathering rich, thick, responses from participants (Esteves, 2014; Hershkowitz et al., 2015; Tourangeau et al., 2014). The interviews consisted of eight main questions, followed by potential follow-up questions determined from participants' responses during the interviews. See Appendix B for the interview questions.

Prior to turning the digital audio device on, I reminded participants that I would use an audio device to record the interview, and I reconfirmed they were amenable to its use. I began the interview with introductory formalities of the participant and me. The interview introduction included information regarding my interdisciplinary training and work experience, and confirmation of the participant's name and background. The introductory stage also included verbal confirmation of the participant's initial written informed consent of participation in the study, estimates of time commitments, and methods for withdrawing from the study. I encouraged participants to talk freely and request clarity of any questions I would present that they did not understand.

The preparation, or warm-up, phase of the interview included an overview of the study objectives and benefits, and a depiction of the researcher and participant's roles. I

followed the warm-up stage with the main context of the interview, using preestablished

interview questions. For the cool-off stage, I focused on follow-up questions and

encouraged the participants to share any additional insight and perception. I closed the

interview with a recap of the study objectives and benefits, and I offered to provide the

participant with a copy of the study results after IRB final approval. I also reminded

participants again about the withdrawal process. As per the requirements of the Belmont

Report protocols and IRB, I reminded participants of my commitment to protect the

confidentiality and identity of study participants and their respective organizations. I

ended the interview with an expression of gratitude for participation in the interview.

Advantages and Disadvantages of Semistructured Interviews

An advantage of the data collection technique of the semistructured interviewing

process is it serves as a tool to ensure research quality based on the research design

(Hazzan & Nutov, 2014; Noble & Smith, 2015; Robinson, 2014). The in-depth,

semistructured interview is appropriate for gathering rich, thick, descriptive details from

the participants to explore their experiences and perspectives to establish meaning of the

phenomenon (Hafford-Letchfield, 2014; Hasman, Kjaergaard, & Esbensen, 2014;

Liedtka, 2015). Through freedom of expression during the qualitative semistructured

interview, participants provide rich, thick, descriptive data to explore the topic deeply and

to obtain reliable data for quality research (Hasman et al., 2014; Irvine, Drew, &

Sainsbury, 2013). Leung (2015) advocated using semistructured interviews to acquire

more details and enhance data saturation from incorporating probing follow-up questions.

In a qualitative case study, Samra, Bottle, and Aylin (2015) used semistructured

interviews to explore how professionals use data and information to monitor the quality of primary care and patient safety.

The flexibility of semistructured interviews will lead to the discovery or elaboration of information that is important to participants, but the researcher may not have previously thought it was pertinent (Alsaawi, 2014; Mueller & Segal, 2015; Ridder, 2017). Unlike structured interviews, semistructured interviews vary in scope and researchers use follow-up questions to responses that warrant further elaboration (Liedtka, 2015; Robinson, 2014; Yin, 2015). Liedtka (2015), Shelton, Smith, and Mort (2014), and Webb (2015) purported researchers can increase data accuracy with follow-up questions.

Another advantage of using face-to-face semistructured interviews is the presence of the researcher provides structure to the interview (McIntosh & Morse, 2015). O'Sullivan, Viggers, and Howden-Chapman (2014) considered face-to-face semistructured interviews as more ethical because the researcher can discern if a participant is becoming uncomfortable or emotional, and can change the dynamics of the interview. Another advantage this type of interview provides is that if a participant appears to be confused with a question, then the researcher can bring clarity to the interview (O'Sullivan, Viggers, & Howden-Chapman, 2014). Using semistructured interviews can serve as a motivation for the exchange of additional questions because participants tend to articulate their thoughts more freely (Doody & Doody, 2015; Lewis, 2015; Noble & Smith, 2015). A major advantage of using face-to-face semistructured

interviews is the researcher can optimize the interview by evaluating participants' verbal and nonverbal responses to the questions (Shapka, Domene, Khan, & Yang, 2016).

McIntosh and Morse (2015) argued that face-to-face semistructured interviews carry the disadvantages of being costly, and the physical presence and appearance of the researcher may influence the participant. Other disadvantages of face-to-face semistructured interviews are the potential of influencing participants to have similar answers; and due to time constraints, fewer interviews can be accomplished (O'Sullivan et al., 2014). Lewis (2015), Noble and Smith (2015), and Marshall and Rossman (2016) contended participants may react to the exposure to collected data adversely in face-to-face semistructured interviews. Face-to-face semistructured interviews can be an inconvenience to the participant or researcher, and a potential participant may not be available or does not prefer the method (McIntosh & Morse, 2015). Another disadvantage is the participant may shy away from responding to sensitive questions when facing the researcher in person (Shapka et al., 2016).

Audio Recording Device

I requested the participants' permission to use an audio recording device to encapsulate the interview. Prior to the start of the interview, I explained the significance of recording the interview, and garnered the participants' verbal consent to record the interview. After alerting the participants in advance, I activated or deactivated the recording device. All participants also allowed a visual recording. I used my IPad for capturing a visual capsulation of the interview data. Researchers commonly use audio

recording devices during interviews (Lewis, 2015; Morse, 2015; Neal et al., 2015; Robinson, 2014).

I downloaded the audio-recorded interviews onto a password-protected computer for transcription later. I later uploaded the digital audio-recorded interviews to a third-party transcriber. After receiving the transcribed data from the third party, I retrieved and printed the interview transcripts. I used member checking to verify the accuracy of transcribed data. Berazneva (2014), Mueller and Segal (2015), and Neal, Neal, VanDyke, and Kornbluh (2015) advocated using audio devices to record interviews in order to reduce interpretation errors. Capturing a verbatim of the entire interview is a major advantage of using an audio rerecording devise (Baškarada, 2014; Lewis, 2015; Neal et al., 2015). Mistakenly deleting data is a common disadvantage of using audio recording devices (Berazneva, 2014; Mueller & Segal, 2015; Owen, 2014).

Document Analysis

Researchers gain valuable information through document review and analysis prior to the interview (Lewis, 2015; Owen, 2014; Yin, 2014). Document analysis in qualitative research is a researcher's close, in-depth review and comparison of documents pertaining to the research phenomenon that will support the findings (Varpio, Ajjawi, Monrouxe, O'brien, & Rees, 2017). Document analysis can aid in the triangulation of data to include the comparison of semistructured interviews, member checking, and review and analysis of archived documents and reports, will aid in reaching data saturation and authenticate data collected (Shelton et al., 2014).

Document analysis included review of the following reports: new hire reports, multiple subsidy reports, income discrepancy reports, EIV reports, and deceased tenants' reports. I also reviewed agency internal control policies, procedures, and HCV administrative policies. I collected data from archived internal audits of the participating, and PHA internal investigative reports of tenant fraud. Examples of source documents I reviewed included letters, e-mail communications, memoranda, administrative documents, and written reports. A common disadvantage of using document analysis is the challenge of authenticating the information provided by participants (Mikkonen, Kyngäs, & Kääriäinen, 2015).

Pilot Studies

Doody and Doody (2015) and Turnbull, Parker, and Needham (2014) described pilot studies as preliminary investigative research with the aim of enhancing future research. Kistin and Silverstein (2015) depicted pilot studies as studies researchers use themselves as a test for a particular research design. Turnbull et al (2014) contended some researchers use pilot studies to assess and tweak research questions. Researchers conduct pilot studies for studying a new intervention or the feasibility of an existing one (Doody & Doody, 2015). Kistin and Silverstein (2015) argued that pilot studies are not necessary for qualitative studies in settings that researchers have the ability to learn on the job. In addition, according to Doody and Doody (2015), pilot studies are time consuming and costly. A pilot study is not necessary to test a research design or enhance the research question of the proposed study; therefore, I did not develop a pilot study.

Member Checking

I used member checking to ensure credibility and trustworthiness in the study. Member-checking process is a means to determine whether the findings are reasonable and whether the themes uncovered appear accurate and credible (Carter, Bryant-Lukosius, DiCenso, Blythe, & Neville, 2014; Harvey, 2015; Hazzan & Nutov, 2014). Presenting similar follow-up questions from different perspectives during the interview is an effective means of validating answers (Birt et al., 2016). Providing participants with a copy of the interview transcript to review will aid the researcher in validating the information received during interview (Lewis, 2015; Noble & Smith, 2015; Thomas, 2016).

Each study participant received a copy of his or her interview transcript to review and confirm accuracy. After transcript verification and data analysis, participants validated the interpretation of their experiences, as recommended by Grossoehme (2014), Thomas (2016), and Vicary, Young, and Hicks (2017). The participants will provide feedback on the data analysis and interpretations.

Data Organization Techniques

Using a reflective journal, I recorded notes during the interviews and throughout the data collection process. Lewis (2015), Merriam and Tisdell (2015), and Yin (2014) recommended various systems for organizing data, such as research logs, reflective journals, and research trackers. Data organization involves obtaining digital voice recordings of participants' responses to interview questions, downloading audio interviews into a password-protected computer, and saving verbatim transcriptions of

interview responses as Microsoft Word documents (Lewis, 2015; Pillonetto, Dinuzzo,

Chen, De Nicolao, & Ljung, 2014).

Other organizational data systems include informed consent forms, document

request letters, interviews, literature review maps, and annotated notes (Lewis, 2015;

Morse, 2015). Merriam and Tisdell (2015), Noble and Smith (2015), and Tong,

Winkelmayer, and Craig (2014) described reflective journals as written notes in

chronological order that researchers create while developing multiple theories and

collaborations over intervals of time. A research log aided in structuring the data

collected into a user-friendly format for accessing when conducting data analysis. It was

critical for me to use detailed, descriptive, and rich information when making notes, in

order to avoid personal bias. After downloading the recorded interviews, a third party

used Microsoft Office 2010 – 2013 to transcribe and convert information to an electronic

format.

Researchers are required to store data on a password-protected computer hard

drive in a home library, and shred data five years after study completion (Davis, 2015;

Miracle, 2016; Ruivo et al., 2014). I stored all raw data, analytical material, signed

informed consent forms, interview transcripts, and interview recordings in a locked,

secured home file cabinet. I stored all electronic data on a secure password-protected

home computer that only I can access. In addition, I stored a backup copy of electronic

data on a USB flash drive, with all files password-protected. I stored the USB flash drive

in a secure, locked storage cabinet in my home with access limited to me. Following five

years after study completion, I will shred all stored informed consent forms, interview

transcripts, interview recordings, raw data, and other collected documents. I will erase electronic data stored on the home computer and USB flash drives after the five-year waiting period.

Data Analysis

Data analysis began after the first interview was completed. Data analysis is a systematic review of data elements involving data interpretation to discover underlying meaning (Elo et al., 2014; Lewis, 2015; Parker, 2014). Kaczynski et al (2014), Morse and McEvoy (2014), and Ridder (2017) described data analysis as the process of using multiple sources of data to provide answers to a research question. Data collection instruments used for the study included semistructured interviews, observations, and archival data from policies, procedures, reports, and audits from management of the identified PHAs. I also used PHA internal investigative reports of tenant fraud, as well as local law enforcement investigative reports of rental housing fraud.

Triangulation

Researchers use triangulation by incorporating a variety of methodologies to interpret data to garner a better understanding of a phenomenon (Carter et al., 2014; Morse, 2015; Parker, 2014). The four types of triangulation methods researchers customarily use are methodological triangulation, investigator triangulation, theory triangulation, and data triangulation (Black, Palombaro, Dole, & Guay, 2015; Carter et al., 2014; Morse & McEvoy, 2014). In methodological triangulation, qualitative researchers incorporate several strategies to examine data on one phenomenon, typically under a case study design (Boddy, 2016; Hussein, 2015; Morse, 2015).

Data triangulation involves using different sources of data to validate findings

(Carter et al., 2014; Hussein, 2015; Noble & Smith, 2015). Experts in case method

recommend a combination of the following sources: (a) direct observations (e.g., human

actions or a physical environment); (b) interviews (e.g., open-ended conversations with

key participants); (c) archival records (e.g., student or medical records); (d) documents

(e.g., newspaper articles, letters, emails, memos, reports); (e) participant observation

(e.g., being identified as a researcher but also filling a real-life role in the scene being

studied); (f) physical artifacts (e.g., computer downloads, photos, posters, that is, objects

that surround people physically and provide them with immediate sensory stimuli to carry

out activities) (Black et al., 2015; Carter et al., 2014; Gilgun, 2015). I used

semistructured interviews, observations, and field notes to triangulate the findings.

Data Analysis Process

Researchers commonly use qualitative content analysis to analyze data collected

in qualitative studies (Elo et al., 2014; Hafford-Letchfield, 2014; Hussein, 2015). The

participants' responses to the interview questions were the primary source data I

analyzed. I developed interview questions that would help to facilitate an exploration of

the central research question: What strategies do business executives use to detect and

eliminate tenant fraud in the subsidized rental housing market?

The interview questions were open-ended to encourage participants to feel

comfortable sharing and describing their experiences and perspectives regarding the

limitations encountered when detecting and mitigating HCV program tenant fraud.

Analyzing secondary data and documentation from the PHA management provided a

more in-depth exploration of the strategies used to combat fraud. I used the five-stage

data analysis process in this study. According to Hafford-Letchfield (2014), Miles,

Huberman, and Saldaña (2014), and Yin (2014), data analysis consists of collecting the

data, using coding to separate the data into grouping, grouping the data into themes,

assessing the material, and developing the conclusion.

The semistructured interviews were digitally audio recorded, downloaded, and

transcribed using Microsoft 2010 through 2013 for conversion to an electronic format.

After receiving the transcribed interviews from a third party, I manually examined

participants' responses to ensure completeness. Microsoft Excel spreadsheets are an

effective tool to use for coding and analyzing research (Ahmad et al., 2014). Carter,

Bryant-Lukosius, DiCenso, Blythe, and Neville (2014), Hussein (2015), and Miles et al.

(2014) and recommended when using data triangulation, researchers should analyze data

separately initially, and then combine and denote any commonalities and variations. I

used Microsoft Excel and Word to store the data in an organized structure separately for

accessing later for coding and document analyses. I collected the secondary data through

researcher observations and note taking of information contained in the documents

collected from participants. I used NVivo software for coding and data analysis to

identify themes, and to sort, manage, and analyze primary and secondary data.

Coding and Identification of Emergent Themes

I denoted central themes and concepts while recording, coding, and evaluating the

data. Qualitative researchers should provide participants with a copy of the interview

transcript to review for accuracy and validation of interpretation of their experiences

(Grossoehme, 2014; Lewis, 2015; Thomas, 2016). To ensure the accuracy of what the

participant stated during the interview, I conduct a transcript review. The transcript

review encompassed performing the following steps: typing a word-for-word transcript of

the interviews and providing participants with a copy (De Massis & Kotlar, 2014; Gentles

et al., 2015; Thomas, 2016). Transcript review also involves inquiring whether the

transcript is an accurate depiction of the participant's statements and inserting applicable

edits Gentles et al., 2015; Grossoehme, 2014; Hazzan & Nutov, 2014).

Qualitative researchers use coding as a mechanism for describing and categorizing

collected data, and the two basic coding methods are deductive coding and inductive

(open) coding (Cheuk, Baskarada, & Koronios, 2017; Phillips, Kenny, Esterman, &

Smith, 2014). To identify and isolate key words and themes related to the conceptual

framework, qualitative researchers use deductive codes developed from a review of the

responses to the interview questions (Phillips et al., 2014; Snelgrove, 2014; St. Pierre &

Jackson, 2014). Theme identification is paramount to the success of qualitative research

(Dasgupta, 2015; Hazzan & Nutov, 2014; Phillips et al., 2014). The frequency of a code

within a data set is an indicator of the relevance of the code (Cheuk et al., 2017;

Snelgrove, 2014; St. Pierre & Jackson, 2014). Coding will also serve to validate the

conceptual framework (Miles, Huberman, & Saldaña, 2014; Phillips et al., 2014;

Snelgrove, 2014).

Dasgupta (2015), Leung (2015), and Miles et al. (2014) cautioned researchers

about manipulating data that increase the risk of researcher biases, and risk invalidating

the research. To reduce the risk of involuntary manipulation, I divided the participants'

interview transcripts into two sets of three each, for review and discovery of emerging themes. After reading the interview transcripts several times and listening to the audio recordings, I used deductive coding to develop themes and determine the relevant words and phrases to code the interview transcripts for each group. Next, I searched for reoccurring words, statements, or sentences in the transcribed interviews to develop specific codes for conversion into a comprehensive code list.

From the code list, I determined categories or themes I deemed related to the research question. I used a codebook to store keywords, themes, and the comprehensive code list. Ando, Cousins, and Young (2014), Morse (2015), and Story, Gross, Harvey, and Whitt-Glover (2017) recommended researchers use a codebook to store identified themes. From the transcribed interviews, I continued generating and refining the codes until no new unique codes emerge. I evaluated any discrepancies in codes. I used the same data analysis process for secondary data (internal source documents) as I used for primary data (interview transcripts). Next, for further validation of data, I used methodological triangulation to compare the primary data to the secondary data.

Qualitative Software Analysis

Researchers use qualitative analysis software such as NVivo to classify, sort, and arrange information; examine relationships in the data; and extract themes and patterns (Castleberry, 2014; Cleary et al., 2014; Miles et al., 2014; Lewis, 2015; Vaismoradi et al., 2013). Scales (2013) purported the Atlas.ti trademark software has a complicated evaluation system, deeming it not as user-friendly as NVivo. After completing the tutorials for Atlas.ti and NVivo software, I decided to use NVivo software. I based my

selection on NVivo being a more user-friendly software for coding and data analysis to establish themes, and to sort, handle, manage, and analyze the data collected through interviews and archival documents. Yin (2014) suggested using flowcharts to categorize the connection between themes. I used reflexivity to compare themes identified in interview transcripts and other data source documents. As I identified similarities among themes of all source documents, an understanding of the leadership strategies needed to combat tenant fraud emerged. I searched for new research on the study phenomenon, and when applicable, I used verbatim quotes of participants to support data analyses.

Reliability and Validity

Reliability and validity approaches are critical elements in scholarly research and needed to legitimize the findings of a study (Alshenqeeti, 2014; Gaur & Kumar, 2017; Yin, 2014). Qualitative researchers need to address the dependability, credibility, conformability, and transferability of research findings (Carter et al., 2014; Cope, 2014; Patton, 2015). Because reliability and validity in qualitative research are not measurable, researchers use research strategies such as member checking, transcript review, and data interpretation (Gaur & Kumar, 2017; Thomas, 2016; Tourangeau et al., 2014). Researchers also use interview questions, expert validation of interview questions, and focus groups to achieve credibility, dependability, confirmability, and transferability (Alshenqeeti, 2014; Titze, Schenck, Logoz, & Lehmkuhl, 2014; Tourangeau et al., 2014).

Reliability

Dependability is an equivalent concept to reliability in qualitative research (Elo et al., 2014). Research transferability is a factor of dependability (Cope, 2014). To ensure

transferability, including a rich, thick description of the research process and member checking is vital (Birt et al., 2016; Morse, 2015; Thomas, 2016). The detailed protocol of the data collection process enhances the reconstruction of a study for dependability (Elo et al., 2014). Trustworthiness is another critical factor needed to establish the reliability of a study (Carter et al., 2014; Thomas, 2016; Yin, 2014). An audit trail is a detailed log of the data collection instrument, processes, techniques, and methods for data coding, analysis, and interpretation (Cope, 2014). The detailed protocol of the data collection process enhances the reconstruction of a study for dependability (Elo et al., 2014). I maintained an audit trail, depicting the data collection instruments, procedures, and techniques used to substantiate dependability of research findings.

Member checking. Member checking involves both transcript accuracy and verification of emerging themes (Morse, 2015; Titze et al., 2014; Tourangeau et al., 2014). Member checking is a process that ensures the accuracy of data that involves asking participants to read their interview transcript (Morse, 2015; Thomas, 2016). Member checking also requires data analysis to validate the accuracy of the transcript and research findings (Thomas, 2016; Tourangeau et al., 2014). Member checking includes transcript checking and analysis checking (Harvey, 2015; Hussein, 2015; Thomas, 2016). Morse (2015) asserted that member checking provides a channel for participants to corroborate the accurateness of interview data and allow for feedback. Reliability validation is the degree to which an assessment tool generates recurrent and dependable results (Lewis, 2015). I incorporated member checking by requesting that the participants read the transcript and data analysis to confirm accuracy.

Expert validation of interview questions. In qualitative research, bias affects the validity and reliability of findings, and consequently, affects business decisions (Patton, 2015). Bias may distort truth and slant and skew data in qualitative research. Cope (2014), Morse (2015), Onwuegbuzie and Byers (2014), and Yin (2014) suggested using experts to validate the interview questions as a means to address personal bias and increase the reliability of qualitative research. To address personal biases in the study and improve the reliability of the research findings, I asked an executive management colleague to review the interview questions before using them. My colleague advised that the interview questions did not reflect any personal bias and would allow me to gain data to address the research problem.

Interview protocol. The interview protocol consists of an informed consent form, semistructured interview questions, interview script, and probing questions, if needed (Alsaawi, 2014; Doody & Noonan, 2013; Esteves, 2014). An interview protocol increases reliability of research findings and allows a degree of freedom and adaptability for researchers to garner information from the respondents in an unbiased manner (Irvine et al., 2013; Lewis, 2015; Robinson, 2014). I adhered to the interview protocol to increase reliability of research outcomes. I also used probing questions to encourage participants to share additional feedback.

Validity

Credibility, conformability, and transferability are equivalent components of validity in qualitative research (Alshenqeeti, 2014; Patton, 2015; Titze et al., 2014). Some theorists believe qualitative researchers are not in one accord regarding what

implicates validity or quality research (Garside, 2014; Morse, 2015; Thomas, 2016). For

qualitative studies, credibility indicates internal validity and transferability shows external

validity, which are both critical factors of research (Leung, 2015; Morse, 2015; Thomas,

2016). Identifying researcher bias is important to establish the validity and credibility of

a study (Cope, 2014). Researchers can use the following techniques to establish the

validity of a study: (a) identify researcher bias, (b) triangulate data, (c) member checking,

(d) evaluate competing explanations, and (e) assess competing explanations (Miles et al.,

2014; Morse, 2015; Thomas, 2016).

Credibility. Qualitative researchers establish the validity of their research

through credibility rather than reliability (Alshenqeeti, 2014; Onwuegbuzie & Byers,

2014). The focus of reliability is measurements (Leung, 2015). Qualitative researchers

substantiate the validity of their research by implementing measures to corroborate the

credibility and transferability of the study (Cope, 2014).

Member checking. Member checking improves validation because it decreases

the chance of misinterpreting the data (Thomas, 2016). In member checking, researchers

verify participants' answers and ask the participants to confirm the emerging themes and

inferences (Birt et al., 2016; Morse, 2015; Thomas, 2016). Member checking also

encompasses researchers asking participants to offer reasons, which researchers can

denote in patterns (Sohn et al., 2017; Thomas, 2016). Member checking is a good

technique to use to follow up at the end of the interview process (Noble & Smith, 2015).

Using member checking establishes credibility and minimizes internal threats to the

research findings (Birt et al., 2016). I used member checking to substantiate validity of the study.

Triangulation. Triangulation is a process researchers use to promote the validity and credibility of data and to combat personal biases (Carter et al., 2014; Cope, 2014; Shelton et al., 2014). I used triangulation of collected data sources through the comparison of interview notes and transcribed data from interviews. The review and analysis of archived documents and reports facilitated validation of secondary source documents.

Participant transcript review. To aid in validating data collected, Lewis (2015), and Noble and Smith (2015) suggested researchers provide the participants with a copy of the interview transcript to review for accuracy. Grossoehme (2014) and Thomas (2016) supported participants validating interpretation of their experiences after interview transcript verification. I provided each study participant with a copy of his or her interview transcript and request validation of the interview data for accuracy.

Evaluation of competing explanations. Researchers who are corroborating the credibility and transferability of a study should derive a line of questions used in the interviews and subsequent data analysis from other comparable studies (Miles et al., 2014; Titze et al., 2014). The similar studies should be credible and transferable (Noble & Smith, 2015). This method will also address personal biases (Darawsheh, 2014). I reviewed comparable studies to aid in bringing credibility and validity to the data analysis in my study. The inclusion of relevant documents to review subject matter, such as news articles, audit reports, and board meeting minutes, brings credibility to a study

(Darawsheh, 2014). I reviewed agency fraud policies and procedures derived from the participating PHA management to corroborate research findings.

Transferability. Noble and Smith (2015) described transferability as the degree research findings pertain to other research contexts to corroborate validity. Using a field review panel to review and comment on the accuracy and integrity of the draft study findings will serve to substantiate the transferability of the study (Alsaawi, 2014; Cope, 2014; Miles et al., 2014). It is important to evaluate whether assessing competing rivals is appropriate for a study (Noble & Smith, 2015). Evaluation is important because researchers risk the incorporation of a potential threat to the validity of the study if they do not adequately conduct research (Miles et al., 2014). Researchers should also evaluate reasonable competing explanations while decoding data (Cope, 2014; Noble & Smith, 2015; Yin, 2014). Marshall and Rossman (2014) suggested that the researcher leave the transferability of research findings to readers and future researchers. Through providing rich, thick, data and connecting the Theory of Planned Behavior to the study of this phenomenon, I left the transferability of my research findings to the reader and future researchers to resolve.

Conformability. Conformability is the level of participants' influence in research findings, rather than the presence of researcher bias (Hadi & Closs, 2016; Yin, 2014). Morse (2015), Noble and Smith (2015), and Robinson (2014) suggested using semistructured interview questions to achieve conformability. To enhance the conformability of data, qualitative researchers can use probing questions during the interview process (Morse, 2015).

A confirmability audit is a technique to consider incorporating into my study. The focus of a confirmability audit is on objectivity, and it involves checking original sources in transcripts, documents, journals, and field notes repeatedly (Cope, 2014; Morse, 2015; Onwuegbuzie & Byers, 2014; Yin, 2014). A confirmability audit helps to control the validity of research (Cope, 2014). The interview protocol I developed aided with maintaining conformability of the research through ensuring consistency when interviewing participants. To ensure the participants' responses and my methodological triangulation substantiate valid research findings, I relied on my doctoral study committee members and other PHA management to validate my interview questions.

Data saturation. Researchers encapsulate data saturation to increase the dependability of qualitative research findings (Finfgeld-Connett, 2014; Goldberg & Allen, 2015; Penderson et al., 2013). Researchers obtain data saturation when participants add no additional value, and inclusion of any new data would feed into a point of diminishing returns (Boddy, 2016; Cope, 2014; Goldberg & Allen, 2015). I used an accepted two-step process (Boddy, 2016) to obtain data saturation. To apply this method, I selected a minimum sample size of six participants for initial analysis. Since I had reached data saturation, I did not incorporate the second step of including additional interviews. No new ideas emerged; therefore, I stopped interviewing after the six interviews.

Transition and Summary

Section 2 included a discussion of the proposed project. The purpose of this qualitative case study was to explore strategies used by some business executives and

owners to detect and combat tenant fraud in the HCV program. The target population

consisted of executive management of PHAs located in central Florida. The role of the

researcher was to function as the primary instrument for the data collection process and to

maintain strict adherence to ethical guidelines (Giorgini et al., 2015; O'Brien et al.,

2014). The validation process gives researchers and the users who rely on research a

significant level of confidence in the effectiveness of the research method when

examining for legitimacy (Cope, 2014; Morse, 2015). The eligibility requirements for

purposefully selected participants included executive managers of PHAs located in the

central Florida region with knowledge and management experience working in subsidized

housing and who had experience detecting and reporting tenant fraud. The criteria

included executive management with current or former employment with a PHA in the

central Florida region.

Following the ethical requirements, I interviewed participants to understand their

point of view of the phenomenon to establish meaning. Semistructured interviews and

archival data were the sources of data. Biases can come from participants' connection

with a subject under study (Liedtka, 2015; Roulston & Shelton, 2015; Webb, 2015). I

used triangulation of multiple data sources and member checking to establish credibility,

conformability, and transferability for this project. I had previously completed the

National Institutes of Health web-based training course about the protection of human

subjects while conducting research. Researchers de-identify participants to ensure the

privacy of all participants and their affiliated agencies (Pillonetto et al., 2014). As

required by the IRB, I stored the data in a safe, secure location for 5 years to protect the

rights of the participants. I will store electronic copies of all collected data and analysis

files on a password-protected computer, and I maintained all hard copies of data and

analytical materials in a locked file in my home that only I have access.

Section 3 includes a discussion of the research findings. Included in the section

are applications to professional practice, implications for social change, recommendations

for action, and recommendations for further study. The section also includes a discussion

of personal reflections, a summary, and research conclusions.

Section 3: Application to Professional Practice and Implications for Change

This section includes the following subsections: (a) a synopsis of the study, (b) the presentation of the findings, (c) applications to professional practice, (d) implications for social change, and (e) recommendations for action. The remaining subsections include recommendations for future research, reflections, and conclusion. Section 3 will also include an analysis of the correlation between study themes and the conceptual frameworks and current research findings.

Synopsis of Study

The purpose of this qualitative multicase study was to explore strategies some business executives might use to detect and eliminate tenant fraud in subsidized rental housing. The study population consisted of business executives of public housing authorities (PHAs) located in central Florida, possessing successful experience in detecting and eliminating tenant fraud in subsidized rental housing. The business executives did not feel comfortable referring any property owners for the study. Therefore, the study participants were limited to business executives employed by PHAs. Participation was voluntary, and I informed participants of their rights to withdraw from the study at any time. All interviews took place in the privacy of the office of each respective participant.

Based on participants' responses, it is apparent that business executives who were successful with strategies implemented to combat tenant fraud in the HCV Program, understood the relationship between attitudes of individuals and subjective norms to what

provoked certain fraudulent behavioral intentions. Ajzen (2014), Ajzen and Sheikh (2016), and Chen (2016) argued that when business executives focused on addressing a certain type of behavior, it is critical to also focus on the attitudes, belief systems, and subjective norms that provoked the behavior, which is in alignment with the TPB.

Presentation of Findings

The overreaching research question for the study was: What strategies do business executives use to detect and eliminate tenant fraud in subsidized rental housing? I used two sources of data for this case study. One source of data was in-depth interviews of six business executives from three PHA business executives located in central Florida. I also examined policies and procedures related to fraud detection strategies developed by the participants. The study of peer-reviewed journals provided a foundation for establishing the relationship between the research question and the conceptual framework.

The use of pseudonyms (e.g., PH1A, PH1B, and PH2A) protected the identity of participants and preserves their confidentiality. Participants 1, 2, and 3 were business executives of the same housing authority, identified as PH1. Participants 4 and 5 were business executives of the second housing authority, referred to as PH2, while participant 6 was a business executive of the third housing authority (PH3). Table 1 reflects the demographics of business executives who had implemented successful strategies to combat tenant fraud in the HCV program. One participant was an executive director, three participants were compliance officers or fraud investigators, and two participants were housing coordinators or administrators. Four participants were female and two were

males. The years of housing business experience ranged from 10 to 30 years, with the

average experience at 18.83 years. The interviews lasted an average of 90 minutes.

Table 1

Demographic Data for Business Executives Who Implemented Successful Strategies

Participant	Position or title	Location	Years of housing business experience
PH1A	Executive Director	Florida	29
PH1B	Compliance Officer	Florida	10
PH1C	Housing Coordinator	Florida	10
PH2A	Housing Administrator	Florida	30
PH2B	Fraud Investigator	Florida	13
PH3A	Director of Compliance and Fraud Recoveries	Florida	21

I presented the same eight semistructured interview questions to each participant.

The use of semistructured interviews, documents, and member checking revealed robust

and holistic strategies developed and implemented to detect and curtail tenant fraud in

their respective agencies. To generate themes, I used open-coding techniques and NVivo

software to aid in identifying high-frequency words or phrases. A discussion of key

elements of the analysis is included in the following subsections.

A Review of Thematic Creation

Participants provided an in-depth comprehension of how PHAs in central Florida

effectively and efficiently detected and reduced tenant fraud in the HCV Program. I

identified reoccurring themes by initially scrutinizing each participant's response to each

interview question separately and then coded the responses for reoccurring themes. Next,

I performed a second analysis based on a combination of all responses, which revealed

identical themes as the first analysis. The predominant emergent themes were (a)

perception of tenant fraud, (b) detect and minimize tenant fraud, (c) tenant attitudes and

belief systems affect fraudulent behavior, and (d) verification procedures. The most

prevalent strategy used was reliance on the Enterprise Income Verification (EIV) system

provided by HUD. The use of the HUD EIV system appeared to be key to combatting

tenant fraud in the HCV Program because it revealed unreported income. Table 2

contains the most prevalent keyword developmental phases from the data analysis.

Table 2

Code Frequency

Codes	*n*	Theme
Strategy: Review of bank statements and tax returns/transcripts	29	2, 4
Strategy: Use of Enterprise Income Verification (EIV)	27	2, 4
Strategy: Verify family members	18	1, 2, 4
Strategy: Improve interview techniques	7	1, 3
Strategy: Department of Motor Vehicle (DMV) contacts and automated background checks	6	2, 4

I conducted a second analysis comprised of a most common word count. I

established theme relationships by assembling word counts, related to the theoretical

concepts. Table 3 is comprised of keywords of theoretical concepts resulting from

thematic formation. The conceptual framework for this study was TPB. Participants

commented that the beliefs and value systems of perpetrators directly motivate them to

commit fraudulent acts. According to the majority of participants, common tenant

attitudes that affected fraudulent behavior included being apologetic, defensive, and defiant. The feeling of remorse by the tenants for their fraudulent actions was the most popular response from participants.

Table 3

Top Six Frequently Occurring Words and Groups Related to Content and Context

No.	Groups and keywords	Theoretic ideas	Theme	*n*
1	Fraud issues and problems	Perceptions	1	10
2	Unreported income and EIV system	Fraud detection	2	35
3	Entitled, blameless, with no remorse	Tenant attitudes, belief system, and behavior	3	15
4	Bank statements and tax returns, verify children, family members	Mitigation strategies	4	32
5	Verification procedures	Effectiveness of strategies	4	29
6	Eliminate zero income and notarized contribution letters	Regulatory changes	2	9

Participants indicated the use of HUD's EIV system and consistent verification procedures improved the success of fraud detection and reduction. The participants stressed the need for regulatory changes, such as eliminating the zero income eligibility and notarized contribution letters, to combat tenant fraud. Table 4 reflects a summary of the coded frequency by the participants for Themes one through four. The HUD EIV system encompasses unreported income of tenants (Greenlee, 2014). All participants suggested that most fraud perpetrators withhold income information because they want the amount of rent paid out of pocket to be the least amount possible. Participants also suggested some tenants withhold income information because they believe PHA staff will

not detect the fraud. Tenants with such belief demonstrated planned behavior in

alignment with the TPB.

Table 4

Topics Mentioned Most Frequently by Participants

	PH 1A	PH 1B	PH 1C	PH 2A	PH 2B	PH 3C	Frequency	Theme
Interview techniques	Y		Y			Y	3	1
Unreported income and EIV	Y	Y	Y	Y	Y	Y	6	2
Entitled, blameless, with no remorse	Y			Y	Y	Y	4	3
Bank statements and tax returns, verify children and family members	Y	Y	Y	Y	Y	Y	6	4
Verification procedures	Y	Y		Y	Y	Y	5	4
Eliminate zero income		Y	Y	Y	Y		4	2

Theme 1: Perception of Tenant Fraud

When Participant 1 (PH1A) began working for the housing authority in 2011,

PH1A felt tenant fraud was prevalent in the agency. PH1A believed former employees

were training tenants how to commit fraud. PH1A also explained how some employees

were enrolling family members on their leases and teaching tenants how to report income

fraudulently to the agency. According to Zeng, Yu, and Wen (2017), nondisclosure of

income, household composition, property, or capital, and no declaration of nondependents are key indicators of rental housing fraud. PH1A shared an example of a fraud case of unreported income that involved an employee of the tenant's employer completing the third-party income verification forms fraudulently for the tenant for each annual recertification for several years. Staff detected the fraud when management switched cases among counselors, and the newly assigned counselor submitted the third-party income verification form to the tenant's employer to complete. After further investigation and calculations for prior years, management discovered the tenant had received $20,000 of ineligible housing assistance. Ugrin and Odom (2017) posited that an individual's perception, and the value of one's integrity, contributes to attitudes toward fraud. Furthermore, an individuals' belief system coupled with a nonchalant attitude towards wrongdoing could change the perception of what is right and wrong (Brown et al., 2016).

Participant 2 (PH1B) was dismayed at the high level of fraud in the agency and perceived the problem as being staff's lack of adequate interview skills and poor follow-up with verifications. PH1B shared a case of an Uber driver who had not reported $30,000 of annual income to the agency. Staff had not detected the unreported income because the EIV does not capture self-employment income. During a random quality control interview, PH1B inquired about additional income and the source of funds for certain household expenses. The Uber driver's wife disclosed the husband's self-employment through a conversation with the husband. PH1B subsequently required the family to submit a copy of their income tax transcript. Management detected the Uber

driver's income from the tax transcript and calculated an overpayment of assistance of

$12,000 for a 3-year period. Participant 3's (PH1C) initial perception of tenant fraud was

that significant number of unreported income cases of fraud existed. PH1C indicated the

problem of tenant fraud in the agency was much larger than initially believed.

Participant 4 (PH2A) believed tenant fraud in their housing authority (PH2) was

much higher than imagined. According to Participant 5 (PH2B), the staff is able to detect

a great deal of fraud; however, the staff also overlooks a significant amount of fraud. In

contrast to the other participants, Participant 6 (PH3A) felt tenant fraud in their agency

(PH3) was of a normal amount, as compared to housing authorities in the surrounding

area. One of the major issues, as noted by PH3A, is the tenants perceive the HCV

program as an entitlement and not as assistance or a program to aide with gaining

economic self-sufficiency. PH3A viewed the HCV program as a cyclical program of

second and third generations of the same families receiving assistance. Table 5 depicts

the coded frequency of Theme 1.

Table 5

Theme 1 Analysis

Code frequency	Word frequency	Participant frequency
18 (Perception of tenant fraud)	10	6

Business executives with a perception of tenant fraud being a significant problem

had implemented a higher number of strategies to combat the problem. Abdullahi and

Mansor (2015) purported that individuals committing fraud have the predisposition to do

something dishonest, evil, or wrong. PH3A was the only participant who believed tenant

fraud was at a normal level, and did not implement as many fraud mitigation strategies as

the other participants. All participants, except PH3A, indicated that the planned

behaviors of fraud perpetrators included intentional ways, based on perpetrators' value

system, to withhold income and family composition information that would increase the

tenant's rent obligation. Such behavior is indicative of the conceptual framework used in

this study, which is the TPB. Carpenter and Reimers (2005) concluded from a study

using the TPB that elements of the TPB signify whether managers demonstrate morals in

their decision-making. The attitude of corporate managers and their perceived control on

decision-making results in a high propensity for violation of generally accepted

accounting principles (GAAP) in order to reach an earnings goal and qualify for a bonus

(Carpenter & Reimers, 2005).

Theme 2: Detect and Minimize Tenant Fraud

Participants having a greater number of fraud detection strategies in place

experienced a higher level of success in detecting and reducing fraud in their respective

agencies. Fraud detection strategies should be able to identify expediently any fraudulent

activities that elude preventive measures (Liu et al., 2015; Tan et al., 2015; Teplitsky &

Harris, 2015). PH2A shared detection of a fraud case that involved a tenant operating an

Air Bed and Breakfast (Airbnb) out of their subsidized unit. According to Phua (2018),

an Airbnb is a community online marketplace that individuals use to rent out their

properties or rooms in their homes on a short-term or long-term basis. Airbnb began in

2008, and grew into a multibillion-dollar business, with an annual average of 10 million

worldwide bookings in 191 countries (Yang, Lee, Lee, & Koo, 2018). PH2A's tenant

rented out a subsidized apartment for several years, for a fraud total of in excess of

$15,000. PH2B discovered the fraud during a random quality control site visit of the

subsidized property.

All participants shared several cases of fraud detection, via HUD's EIV system.

The EIV system is an electronic database operated by HUD that is comprised of third-

party income source and employment information for minors and adults, by social

security number and household (HUD, 2013; U.S. GAO, 2014). Sources of income

provided in the EIV system include the Social Security Administration, Social Security

Supplemental Income, employment, unemployment, and other sources of household

income (French & Ruiz, 2011; HUD, 2014). All participants commented that the biggest

downside with the EIV system is that HUD officials report the data in the EIV system

four to six months behind schedule. All participants concurred the delay of live data

reporting results in detection of some fraud cases at least 12 months later at a tenant's

next annual recertification process. PH2B explained the EIV system provides hire dates,

which provided a link to a definite date of when unreported income of a household may

have begun.

PH3A explained public records is a good resource to use to determine tenants who

are in jail, or who may have a criminal background that would prohibit the receipt of

housing assistance. PH1B and PH2B shared they had established partnerships with local

county and city government employees, as well as Department of Children and Families

(DCF) staff to use as resources of information on mutual clients to detect fraud.

Table 6

Theme 2 Analysis

Code frequency	Word frequency	Participant frequency
29 (Detect and Minimize Tenant Fraud)	35	6

When compared to other participants, PH2A and PH2B reported they had detected

a significant amount of fraud. PH2A believed the employment of a dedicated fraud

investigator supported the success of the agency's fraud detection efforts. However,

PH2A admitted a significant number of their agency's fraud tips came from anonymous

calls, which led to the use of detection techniques. PH1A and PH3A also shared that they

receive a significant number of fraud tips from anonymous outside sources. There was a

consensus among participants that HCV program applicants and tenants who only agree

to interviews during their lunch breaks might be a red flag concealing the fact that the

individual worked. Whistleblowing is the most effective fraud detection technique

(Brown et al., 2016).

Those participants who required tenants to provide copies of income tax returns or

transcripts (PH2A, PH2B, and PH3A) were able to detect additional unreported income

not reflected in the EIV system. PH1A shared information about a fraud case involving

self-employment income of an Uber driver that staff detected from review of income tax

returns after receiving employment information from the spouse. PH1 staff reviewed

Schedule C of the income tax return and determined the client had reported gross income

on the tax return derived from working as a self-employed Uber driver. After comparing

the income reported on the tax return to income reported by client on the housing

application, PH1 staff determined the client had failed to report Uber self-employment

income. As noted by all participants as a substantial flaw, the EIV system did not capture

self-employment. Under certain circumstances, HUD officials allow PHA employees to

use pay-stubs to project income once they receive EIV data (McClure et al., 2014). Those

circumstances include such cases where the family does not dispute the EIV employer

data and where the PHA does not determine it is necessary to obtain additional third-party

data (HUD, 2014; U.S. GAO, 2014).

PH2A and PH2B walked me through the review of an EIV report, and explained

how to analyze it. The EIV report contains demographic information for all household

members, which includes name, gender, race, ethnicity, social security number, and date

of birth (Riccio, Deitch, & Verma, 2017). The EIV report include income categorized by

quarters and the household member's name, source of income, income receipt start date

or date of hire, and income amount (Riccio et al., 2017). Participants require tenants to

sign the EIV report, acknowledging information reported is accurate.

PH1C commented that close observation of tenants during appointments is a good

detection technique. PH1C shared the details of a case that a tenant's adult daughter

accidentally discussed employment with the mother during an interview at the PHA, but

the information was not included on the tenant's application. PH1C detected the fraud

through a review of information on the application and the EIV system, comparing it to

the information the tenant's daughter disclosed during the interview. After further

review, PH1C discovered the head of household had three adult daughters living in the

household who had jobs. The case resulted in termination of the family and the tenant

owing the PHA approximately $24,000.

PH2B shared detection techniques of a case involving a food handler at the local

airport, who drove three very expensive vehicles to housing appointments, a BMW-7

Series, Mercedes Sedan, and a Jaguar. According to PH2B, said tenant was living in a 5-

bedroom/ 4-bath, $500,000 house with a 3-car garage in a gated community that the PHA

subsidized. As a way to detect and validate suspicion of fraud, PH2B made note of the

tag numbers of the vehicles the tenant drove to appointments, and requested a DMV staff

member/friend run the license plates for ownership. According to PH2B, the three

vehicles belong to the head of household listed in PH2's system as recipient of housing

assistance.

PH2B shared how management further detected the fraud through random site

visits of the property, posing as a prospective homebuyer asking questions of the

occupants about the subsidized house. During a second random drive by of the house,

PH2B gained access by following another vehicle into the gated community. PH2B

reported that the home had a *"for sale"* sign in the yard, which PH2B noted the contact

information and called the Realtor. While walking around the house and waiting for the

occupants to arrive home, PH2B noticed a man, assumed the boyfriend of the tenant,

drive a new Ford F350 truck into the garage. As the alleged boyfriend was placing a key

in the doorknob, PH2B inquired about the house and neighborhood for raising children.

PH2B indicated the alleged boyfriend shared that he had been living in the house for a

year with his girlfriend and two children. The tenant of record arrived at the home

driving a 700s BMW, and the garage contained a new Jaguar and Mercedes Benz.

   After further investigating, PH2B determined the tenants were renting the home

from a friend, and paying the friend additional rent illegally (under the table). PH2B

noted that at the conclusion of the fraud investigation, the tenant owed the PHA $83,000,

and the OIG took over the investigation and prosecution of the perpetrators of fraud.

PH2B noted that in this case, the belief system of the perpetrators involved an entitlement

posture. This was indicative of the TPB, the conceptual framework for this study.

   PH3A mentioned that their agency experienced a significant amount of dual fraud

between income tax returns and the HCV program. According to PH3A, tax fraud from

self-employment businesses have become the most predominant fraudulent scheme for

the PHA. In those cases, tenants may have reported self-employment income fraudulently

to the Internal Revenue Service (IRS) for the purposes of receiving a refund through the

Earned Income Tax Credit (EITC). Conversely, these same tenants may not have

reported the fraudulent income to the housing authority because they did not want their

portion of rental obligation to increase. The federal government grants a tax refund in the

form of EITC to wage earners falling within a certain income bracket (Hoynes & Patel,

2017). Single parents with children, whose income fall between 75% and 150% of the

poverty margin, receive the greatest income increasing impact from the EITC (Quinn &

Cahill, 2017).

   Once PH3's counselors discover conflicting information between income tax

returns and tenant reported income or EIV reports, staff will submit the cases to PH3A for

further investigation and processing for fraud. Jones (2017) asserted that many low-income families depend on EITC, which is the largest cash-transfer program, and it yields a high level of fraud cases annually. PH3A described their agency's informal partnership with a local IRS office employee, regarding the exchange of information on fraud cases with one another.

According to PH3A, the majority of their tenants committing dual fraud opt to repay the housing authority, instead of conceding to income tax fraud to the IRS. PH3A noted that their tenants choose this option because of the potential for greater punishment with the IRS. Some of the punishments for income tax fraud include prison time and accrual of high interest rates on unpaid balances (Alm, Bernasconi, Laury, Lee, & Wallace, 2017). According to PH3A, if management determines that a tenant reported self-employment income to the IRS and failed to report self-employment income to the PHA, termination of housing assistance occurs with no exceptions. Participant PH3A and I reviewed an income tax transcript and tax return provided by a tenant, and PH3A explained the differences between the two. Schedule C of the tax return provided by tenant included the gross self-employment income, related business expenses, and net income generated from the business. PH3A explained that each section of the tax transcript included income reported to the IRS, along with the source of income. According to PH3A, any discrepancies between the two documents, such as income reflected one report and not the other are red flag indicators of fraud.

All participants mentioned using the review of bank statements as an easy detection tool for unreported income. Tenants are required to provide their bank name

and account numbers and sign a written authorization of release of information to the

housing authority for third-party verifications. Participants explained the detection of

unreported income process involves searching the bank statements for repetitive

unidentified deposits. Participants stressed the importance of staff reviewing the tenant

eligibility applications carefully for completeness and any discrepancies.

There was a consensus among participants that incomplete applications may

indicate a red flag of potential fraud. PH3A audits 100% of the files processed monthly

by the counselors, which has also been an effective fraud detection tool. PH3A shared a

copy of the file audit checklist that management used for internal file audits. The audit

checklist included all required documents that should be in the file and a computation

form to verify staff had done rent income and calculations correctly. Acknowledgement

of staff verification of certain documents was included on the audit checklist. The audit

checklist also contained questions requiring a *yes* or *no* response acknowledging

signatures and dates on forms. Items reflected on the audit checklist helped to establish

theme four, verification procedures.

PH1C discussed common red flags of possible tenant fraud detection included

tenants reporting zero income to the PHA and no child support from absentee fathers

when children resided in the home. Other than PH3A, all participants required families

who had reported zero household income to meet with counselors on a quarterly basis to

disclose how they were paying for standard non-food expenses. In addition to cash

contributions, HUD regulations include the value of non-cash contributions, other than

food, as income for the purposes of calculating tenant rent obligations (Collinson &

Ganong, 2018; HUD, 2014). The higher the family's income at the initial calculation of rent subsidy, the higher the initial voucher will be for establishing qualification for a particular unit (Nordvik, 2015; Öst, 2014).

Although notarized letters of cash contributions from nonhousehold members are acceptable proof of income (Collinson & Ganong, 2018; Phillips, 2017), participants reported tenants often submit a change (elimination) in non-household cash contributions the following month after the PHA issues a voucher to the family. Once an income change request for any reduction in income is processed, the housing authority will be responsible for a greater portion of the rent (Carder et al., 2016; Collinson & Ganong, 2018; Eriksen & Ross, 2015).

There was a consensus among participants that questionable photo identification, such as an outdated Florida identification card or driver's license, and altered documents, were common red flags of tenant fraud. The majority of the participants mentioned that altered documents might include social security cards, birth certificates, school records, and driver's licenses. In Florida, it is a felony if the resident does not include their current address on the driver's license (Schuessler, Nagy, Fulk, & Dearing, 2017).

PH2A shared information about a case involving the housing authority paying subsidies on a house for tenants who also were the owners. While working on a different case, staff detected a suspicion of fraud between two cases after using the *Clear* software to run background checks. PH2 staff confirmed the fraud through a review of properties on the property appraiser's website and comparing information to what the tenant and other family members of the tenant had disclosed on several eligibility applications.

According to PH2A, the tenant was using the rental housing subsidies to make mortgage payments for the property. Due to the tenant fraud committed, the housing authority had paid more than $15,000 in housing subsidies in error to the tenants. When questioned about the fraud, the tenant expressed no remorse, but instead revealed a belief system of having to do whatever it takes for family survival. In this particular case, the tenant was acting in harmony with the conceptual framework, TPB, with their belief system shaping behavior (Li, Wang, & Sun, 2017; Teng et al., 2015).

PH2B indicated questionable government benefits, such as food stamps and the Temporary Aide for Needy Families (TANF), which did not correlate to the size of the household, may be an indication of possible fraud between housing and welfare benefits. The State of Florida bases TANF benefits and food stamps on family size (Donley, Crisafi, Mullins, & Wright, 2017). PH1C indicated HUD's multiple subsidy reports are the most effective tools used to detect fraud among tenants with duplicate social security numbers of household members listed in databases of multiple housing authorities.

PH1C provided a sample copy of a multiple subsidy report and explained how to evaluate report for red flags typical of fraud detection. The multiple subsidy report included head of household's name, along with applicable names of household members included in the household of other subsidized families, and the corresponding PHA and program type. The contact staff name, email, and telephone number of the multiple agencies are included in the report. PH1C explained that staff would call the duplicate subsidizing agency and report the double subsidy. The two agencies would exchange tenant information for documentation and contact the tenant to begin a fraud

investigation. PH2B and PH3A also explained the multiple subsidy report to me, concurring with PH1C's explanation.

PH3A shared HUD debts owed report generated from HUD's database with me, and explained how to evaluate the report. The HUD debts owed report includes the head of household's name, end of participation (EOP) date, debt type, debt amount, acknowledgement of repayment agreement executed, and reason for EOP. Reasons noted for EOP included type of lease violation, termination, eviction, nonpayment of rent, and other miscellaneous reason. According to PH3A, evaluation should include making notation of the PHA name the tenant owes the debt, and the PHA's contact information to validate the outstanding debt. PHA staff should not process housing assistance for any family that owes monies to another PHA (HUD, 2014; McClure et al., 2014). PH1C and PH2A also explained the debts owed report, concurring with PH3A's description of the report.

PH3A mentioned the use of the background software, *LexisNexis*, to conduct background checks of tenants to detect discrepancies on eligibility applications. PH3A provided me with a copy of one of the reports generated from the *LexisNexis* software, and explained how to analyze it, and shared examples of red flag detection items of fraud. According to PH3A, software users enter as much known information as possible. At a minimum, users should enter the name, social security number, date of birth, and last known address of the head of household. The sample report from the LexisNexis software reported data on a nationwide basis. The report included the head of household's name, date of birth, driver's license information, known addresses for the

past 20 years, names of other individuals residing at the same address, and DMV

information for individuals at the same address.

DMV information includes the driver's license number of individuals listed for

the addresses on the report, the year, make, and model of vehicles registered at the

addresses on the report. PH3A compared the data generated by the LexisNexis software

to tenant application, to determine potential additional household members. To address

any discrepancies noted between the report data and tenant application, PH3A trained

staff to ask follow-up questions of the tenant.

PH2B described the use of DMV contacts to run license plate registrations of

vehicles parked at subsidized properties to detect fraud of unreported household

members' registered vehicles with the subsidized property addresses. PH2B reviewed a

sample DMV report with me and explained how to cross check with information in a

tenant's file. The DMV report reviewed included the registered owner's name, address,

and dates of birth, and the year, make, and model of vehicles PH2B provided tag numbers

to the DMV personnel. The crosscheck process included comparing the information

provided in the DMV reports to tenant application, noting any discrepancies between the

application data and DMV report. If the registered owner's name is not included on the

tenant's application as a household member, staff will ask follow-up questions regarding

the vehicle owner. Depending on answers the tenant provides, staff might require the

tenant provide proof of the vehicle owner's address. According to PH2B, the unreported

household members will often have income, and many are not eligible for the HCV

program, due to a history of felonies. HUD prohibits subsidies for individuals with

certain felonies (Greenlee, 2014). Varady and Matos (2017) and Walter, Viglione, and Tillyer (2017) asserted that tenants living in subsidized housing tend to withhold disclosure of individuals living with them who have criminal histories in fear of termination of housing assistance.

PH2A, PH2B, and PH3A suggested any member of staff might detect red flags of tenant fraud, to include the receptionist making observations of tenants driving vehicles to appointments and maintenance workers observing the number of individuals residing regularly in a household. PH3A suggested PHA staff closely observe tenants' nails, hair, and expensive clothes and purses, as potential red flags of detecting fraud. PH3A provided an example of a contracted pest control worker detecting a suspicion of fraud of children toys and clothes being in a rental unit of a single member household. According to PH3A, the HCV inspectors were a great source to use as fraud detectors of unreported household members residing in subsidized units. HUD requires PHAs to conduct inspections of subsidized housing units on at least an annual basis (Schwartz, Mihaly, & Gala, 2017). From a study using the TPB to research why employees demonstrate dishonest behavior, Hollow (2014) purported that an individual's morals, beliefs, and underlying motives will push the individual to act on an impulse of dishonesty. Moreover, the extent that an individual perceives a fraudulent behavior as common or acceptable will drive the individual to engage in the dishonest behavior (Haithem et al., 2014). Researchers posited in a study using the TPB that consumer fraudulent behaviors create significant material and psychological costs to organizations (Haithem, Ayisi, & Hedhli, 2014).

Theme 3: Tenant Attitudes and Belief Systems Affect Fraudulent Behavior

In PH1A's viewpoint, most tenants expressed remorse for getting caught committing fraud and that they felt the fraud was necessary in order to take care of the family. In one fraud case, PH1A depicted the tenants' attitude in several fraud cases as one of desperation to take care of their family. Ajzen (2014) suggested application of the theoretical concept, theory of planned behavior (TPB) addresses the attitudes, belief systems, and subjective norms that influence human behavior. Li, Wang, and Sun (2017) asserted that PHA tenants typically act in concert with their belief system of what they believe they deserve in housing. Lin and Chen (2011) used the TPB to investigate workplace dishonesty and purported that the attitudes and subjective norms of the employees directly influenced behaviors of dishonesty. Factors of the TPB, beliefs, attitudes, subjective norms, and perceived control dictated the behavior of Islamic students in a study on investing in a cash waqf (endowment) for their education (Ratnasari & Arifin, 2017).

PH1A explained that the housing authority grants tenants due process for any fraud allegations, via a hearing held in front of an advisory board. The advisory board determines the repercussions of the fraudulent behavior, which oftentimes result in termination from the program. As the agency's Compliance Officer, PH1B's role in the fraud investigation process included reviewing cases and calculating the monetary value of funds owed to the PHA. Consequently, PH1B had little or no interaction with perpetrators. PH1C depicted tenants' behavior as an act of surprise the PHA staff had discovered the fraud. PH1C's tenants did not deny committing the fraud, and the tenants

believed the fraudulent actions were not a big issue. According to PH1C, tenants who

had committed fraud tried to justify their actions as being logical and necessary. Ajzen

(2014) asserted that an individual's belief system and attitudes directly influenced

fraudulent behavior. Pfeiffer and Lucio (2016) posited that Section 8 (aka HCV) renters

tend to behave in a survival mode when faced with adversity.

Table 7

Theme 3 Analysis

Code frequency	Word frequency	Participant frequency
16 (Tenant attitudes and belief system affect fraudulent behavior)	7	15

PH2B described tenant behaviors as running the gamut from remorse, apologetic,

and defiant, to the tenants believing they had a right to the HCV program benefits. PH2A

concurred with PH2B that the tenant attitudes were not consistently the same in each

case. In the Airbnb case, PH2A described the tenant's attitude as one of apologetic.

Conversely, in another case of an elderly tenant failing to report pension income, PH2A

explained the tenant expressed no remorse for committing fraud. The tenant in the

pension fraud case, according to PH2A, had an attitude that the PHA had taken long

enough to detect the fraud. In other cases, PH2A described tenants' attitudes of persistent

denial of any wrongdoing.

PH2A shared an experience with a case of a tenant who had received several

months of utility assistance in error, due to fiscal staff not processing the interim change

in a timely manner. The tenant receiving the utility assistance in error blamed the PHA

staff for the mistake, insisting the staff as being incompetent, and insisted no refund was due to the PHA. The tenants' belief about their actions regarding this case not being fraudulent behavior was indicative of the conceptual framework for this study, TPB (Li et al., 2017). PH2A felt the tenant with the overpayment of utility assistance should repay the funds because the counselor had calculated the assistance correctly, but the fiscal staff had missed the change due to an oversight.

PH2B suggested the tenants often feel the HCV program is an entitlement program and the tenants have a right to the assistance. One case PH2B shared involved a tenant who had earned a law degree while participating in the HCV program. Upon recertification, the tenant was going to lose eligibility due to income; therefore, the tenant quit her job in order to maintain the housing assistance. PH2B asserted the mindset of said tenant was one of defeatist. PH2B alluded the program should not include an inheritance feature for families because it becomes cyclical and more of an enabling program to work less. PH2A alleged that tenants who commit fraud do not see anything wrong with their fraudulent actions. According to PH2A, tenants try to justify committing fraud by indicating everyone else does it and they are doing it to survive, with no other survival choices available.

The tenants' beliefs and planned behavior to commit fraud were in accord with the TPB (Ajzen, 2014). Lin and Chen (2011) concluded from a study using the TPB on investigating workplace dishonesty in Taiwan, that an individual's intentions, perceived control, and beliefs give propensity to commit fraud. From the WorldCom, Enron, and Xerox financial fraud cases, researches have concluded that the managers' belief that the

requirement to meet profit quotas superseded all other factors was the primary root of their fraudulent behavior (Carpenter & Reimers, 2005). In a management behavior study, using TPB to examine publicized fraud cases, Cohen, Ding, Lesage, and Stolowy (2017) suggested that unethical behavior and belief system were the underlying reasons managers committed fraud. Results from the management behavior study support that incentives, opportunities, and management attitudes/rationalizations were the primary influences of corporate fraud (Cohen et al., 2017).

PH3A shared the majority of the tenants of PH3 do not deny committing fraud, but instead will file complaints of discrimination to the HUD field office having oversight over PH3. According to PH3A, the majority of the tenants committing fraud do not express any feelings of remorse because the tenants' belief system exonerates them from the act of any wrongdoing. PH3A's tenants exemplify a belief system of entitlement to the HCV program benefits, and therefore, they express no feelings of remorse. The hearing officer advisory panel of PH3 consists of pro bono attorneys. van Oorschot and Roosm (2017) asserted that the welfare system enables beneficiaries to feel entitled to government assistance and creates a dependency among its users.

PH1A explained procedures of the due process for resolution that management provides to tenants whose staff have alleged that tenants have committed fraud. The procedure of PH1's due process includes sending a termination notice to a tenant that includes a notation that the tenant has an opportunity to request a hearing to tell their side of the story involving the alleged fraud. The procurement officer and finance director serve as the hearing officers for PH1's HCV fraud cases. PH1A serves as the backup for

the hearing officers. According to PH1A, during the hearing, tenants present their side of the story and any evidence they may choose. PH1 hearing officers will present the agency's evidence corroborating the alleged fraud. Final decision of termination lies with the hearing officers.

Per PH2A, PH2B, and PH3A, anger is one of the prevalent emotions of tenants committing HCV program fraud. PH1C indicated that while tenants have not expressed anger when management discovered the fraud, tenants expressed more of the emotion of surprise that the PHA staff had discovered the fraud. According to PH1C, the tenants did not deny the fraudulent acts, but instead, minimized their actions. PH1C asserted that tenants offer justification for committing fraud as a way to minimize the fraudulent act. According to PH3A, some tenants bring family members with them to the hearing process and the parties become belligerent during the hearing. PH3 management will escort any unruly individuals out of the hearing. Lebel (2017) suggested that although some researchers have asserted that anger fuels negative and reactive behavior, anger might promote proactive behavior. In a study using the TPB to research from a global perspective what triggers influence people to commit fraud, researchers concluded that three factors motivate people to commit fraud (Haithem et al., 2014). The triggers included perceived need or pressure, perceived opportunity, and a justifiable attitude (Haithem et al., 2014).

Theme 4: Verification Procedures

Opperman (2014) suggested the success of any anti-corruption strategies rests in the detection of fraud, elimination of any occurrence of fraud, and persecution and

conviction of perpetrators. Employees have a better opportunity of detecting fraud if they

invoke the elements of the TPB when examining fraud motivators and understanding

cultural diversity (Haithem et al., 2014). All participants asserted that strong and accurate

verification procedures of tenant income and household composition are the best strategy

available to combat tenant fraud. Participants provided consistent strategies used to

minimize fraud in their respective agencies.

Table 8

Theme 4 Analysis

Code frequency	Word frequency	Participant frequency
9 (Verification procedures)	29	5

All participants cited the review of three consecutive months of bank statements

for any regular and irregular deposits and withdrawals, as one of the most effective

strategies for verifying income. PH1C and PH3A noted they pay close attention to

PayPal transactions on bank statements as a potential red flag for unreported income. As

noted by all participants, the review of two consecutive years of federal income tax

returns or transcripts of all adult tenant-household members, with or without income, is

also one of the most effective strategies for verifying income and household members

reported by tenants. Verification of income and household composition is paramount to

detecting fraud among welfare recipients (Prenzler, 2017). HUD officials authorize PHA

staff to use five methods to verify family information and specify the circumstances in

which each method should be used (Webb, Frescoln, & Rohe, 2016). In general, HUD

officials require PHA staff to use the most reliable form of verification that is available

and to document the reasons when the PHA staff uses a lesser form of verification

(McClure et al., 2014; Walter & Wang, 2016). Following is a list of the income

verification methods HUD officials permit PHA staff to use, in order of reliability and

priority:

1. Enterprise Income Verification (EIV) whenever available

2. Third-party Written Verification

3. Third-party Oral Verification

4. Review of Documents

5. Self-Certification

All participants noted that their PHA management's enforcement of staff's use of

the EIV system is the second most effective strategy to combat tenant fraud. PH1B

indicated that PH1 management requires staff to compare the EIV report to the tenant's

occupancy application for any discrepancies. PH1B and PH1C indicated PH1 staff

reviews the EIV report with each respective tenant, and require the tenant's signature of

concurrence of report accuracy. In 2010, HUD mandated PHA staff use the EIV system

as a Tier 1 level of verifying income (French & Ruiz, 2011; HUD, 2014; U.S. GAO,

2014).

PH1B, PH2A, PH2B, and PH3A commented the use of the work number as

another source of verifying tenant wages. Participants expressed their dislike of HUD's

allowance for tenants to claim zero income and use statements of family financial

contributions. Other than PH1A, all participants noted their agency's requirement of

counselors to meet quarterly individually with any tenant claiming zero household income.

All participants noted verification of family household composition as the third highest used strategy. All participants noted they research local county public records to garner information about HCV tenants and their families. PH2B shared that the use of the county public records to determine addresses used for DMV tickets is an effective tool to begin investigation of household members residing in a unit. Participants also use public records to validate marriage certificates and divorce decrees.

PH2A and PH2B use information provided by the local county probation and parole office staff to document unauthorized guests residing in a subsidized unit. Electronic databases used in public records search are another effective resource for detecting fraud (Pacini, Hopwood, & Sinclair, 2016). Participants noted requiring proof of unauthorized household members having vacated the unit, such as a written lease of a unit at another location, as an important strategy for verification of household members.

Participants emphasized the importance of having improved interviewing techniques as the fourth most frequently used strategy to combat housing fraud. All participants conducted at least monthly staff meetings and trainings, to improve interview techniques and discuss other fraud detection techniques and current fraud cases. Participants PH1A, PH1B, PH2A, PH2B, and PH3A shared that brainstorming among staff during internal meetings was impactful to the deterrence of fraud. Employees with adequate interviewing techniques that focus on the behavior and attitudes of tenants have a higher probability of ensuring quality control protocol (Provost & Euchner, 2017).

PH1C, PH2B, and PH3A shared the following interviewing ideas as effective techniques to use with tenants: (a) use broad questions, (b) use narrow questions to garner specific responses, (c) use probing questions to follow-up, (d) avoid multiple questions, (e) allow time for a response, (f) avoid leads and cues, (g) ask tough questions, and (h) be an educator continuously. PH1B, PH2A, PH2B, and PH3A stressed the importance for staff to schedule enough time between appointments, review past information reflected on EIV reports, and secure signatures for all adult household members. The purpose of the application or tenant interview is to obtain complete and accurate information in order to establish tenant eligibility and level of assistance (Ellen, 2018; HUD, 2014; Walter & Wang, 2016).

As the PHA budget permits, participants sponsor external training opportunities for their respective employees. As effective strategies to reduce subsidized housing fraud, participants noted they use internal file audits and subsequent individualized staff coaching. PH1C noted the requirement of adequate third-party documentation for adding or deleting a household member is an effective tool for detecting unauthorized household members. All participants noted the PHA's requirement of school registration documents for verification of children residing in a household.

All participants emphasized the importance of staff's observations while conducting applicant and annual tenant interviews. The primary observations of tenants included attire, hair, nails, and jewelry, and cell phones and IPads in possession during appointments with PHA staff. PH1A, PH2A, PH2B, and PH3A suggested expensive clothing, jewelry, and electronics might be indicative of a tenant's undisclosed income.

In said cases, PHA employees will inquire of tenants' source of income to pay for said

luxuries. PH1A, PH1C, PH2B, and PH3A believed a tenant's display of nervousness

during an interview might be indicative of the tenant hiding information. Walsh, Dando,

and Ormerod (2018) asserted that welfare investigators should use a triage decision-

making technique that includes investigators' subjective observations of perpetrators.

PH1B, PH1C, PH2A, PH2B, and PH3A noted the use of automated background

check software and DMV staff contacts as an effective strategy for verification of

household members, employment, and registration of vehicles. Participants noted this

strategy as the fifth most frequently used anti-fraud strategy. PH2A and PH2B noted the

use of a background software, *Clear,* to conduct background checks.

According to PH2A, software users enter as much known information as possible.

At a minimum, users should enter their name, social security number, date of birth, and

last known address of the head of household. As described by PH2B, the *Clear* software

provides nationwide data that included the head of household's name, date of birth,

driver's license information, known addresses for the past 10 years, names of other

individuals residing at the same address, voters registered at the address, and DMV

information for individuals at the same address. DMV information included the driver's

license number of individuals listed for the addresses reflected on the report. Additional

DMV report information included the year, make, and model of vehicles registered at the

addresses on the report. PH2B compared information from the *Clear* software to the

tenant application, to determine potential additional household members.

As a proactive fraud detection software, PH3A advocated that *LexisNexis* software might lead to staff conducting comprehensive background checks through public records, utilities, voter's registration identification, and DMV searches on tenants. As an inexpensive software, PH3A noted the software costs the organization $158 per month, regardless of how many or often staff uses the software. PH3A posited that the benefits of the *LexisNexis* far exceed the costs. *LexisNexis* software developers have continued to improve technology of the global software to increase its effectiveness in customer collaboration (Waldron, 2017).

PH2B and PH3A conduct random drive-by site visits of subsidized units to note vehicle tag numbers. As result of previous long-term employment at a large governmental agency, PH2B noted using DMV staff contacts to research ownership of automobiles that tenants drive. PH2B also noted the use of DMV staff contacts for researching the ownership of vehicles that tenants park in the yards of subsidized units. PH3A uses the *LexisNexis* software to conduct background checks of tenants. PH2A, PH2B, and PH3A submit address inquiries to the U.S. postal system to identify occupants of subsidized units.

As an anti-fraud strategy, all participants reported that their management teams require counselors to switch tenant caseloads at least once per year. This strategy serves as an additional review of case files as a mechanism for determining potential employee fraud and oversight of tenant fraud. PH1C, PH2B, and PH3A alluded to the collaboration between employees and tenants being a prevalent issue in their respective agencies. PH1C switches caseloads between counselors every six months. PH1A and PH3C

conduct random meetings with tenant staff have suspected are committing fraud. If a case does not warrant termination of housing assistance, PH2B will meet with tenant and use scare tactics to warn tenants that their behavior may lead to termination.

PH1A, PH2A, and PH3A provided electronic copies of their respective HCV administrative policies and procedures manual. PH3A provided a copy of the agency's internal control policy and fraud prevention training manual. Participants provided copies of their respective policies, procedures, and fraud-prevention training manual for my review as source documents. I noted the HCV administrative policies did not contain any specific information pertaining to fraud detection and prevention. However, said policies and procedures included program eligibility criteria and a systematic protocol for verifying information provided by tenants. PH3A's fraud-prevention training manual was comprehensive and contained examples of fraud detection red flags to be aware of, and steps to take upon discovery.

Analysis of TPB Related to Research Findings

A thorough review of the literature resulted a lack of current research on the topic of strategies to combat tenant fraud in the rental housing market. Study findings suggest that tenant attitudes and behaviors correlate to subsidized housing fraud, in accord with the conceptual framework used for this study. Lin and Chen (2011) purported that the three conceptually independent determinants of intention in the TPB include attitude, subjective norm, and perceived behavioral control. Tenants' norms, intentions, reactions, and perceived behavioral control were the factors that formed the conceptual framework of this study. Perception, attitudes, and norms determined the amount of tenant fraud

committed, and other issues such as employee errors and collaboration between

employees and tenants to commit fraud. The TPB was appropriate for exploring

strategies business executives use to combat tenant fraud in rental housing.

The following section will include (a) business executives' perception of tenants'

attitudes and belief system toward fraud, (b) business executives' perceived control of

fraud, and (c) business executives' norms and attitudes related to combatting tenant fraud.

Business executives' perception of tenants' attitude and belief system toward

fraud. All participants expressed frustration and resentment toward the attitudes of

tenants committing fraud. Attitude is the primary influence of an individual's intent to

participate in a certain behavior (Yang et al., 2017). In alignment with the TPB, an

individual's intent to commit a certain behavior is influenced by (a) beliefs regarding a

particular behavior, (b) the normative expectations of others toward the perpetrator of the

behavior, and (c) the individual's perception of behavioral control (Chen, 2016; Lortie &

Castogiovanni, 2015; Meng, Othman, D'Silva, & Omar, 2014). In contrast, attributing

the TPB to rationalize human behavior is not logical (Sniehotta et al., 2014). Based on

tenant responses to PHA management about being caught committing fraud, PH1A,

PH2A, PH2A, and PH2B perceived the tenants' belief system of the HCV being a right or

entitlement, influenced tenants' decision to commit fraud. In a study of employee

dishonesty in the workplace, Lin and Chen (2011) recommended organization

management should develop strategies to improve employees' attitudes and develop

positive norms within the organization.

Business executives' perceived control of fraud. PH3A indicated that PHA staff could control some fraudulent behavior through fraud detection and prevention strategies. The staff errors that can thwart prosecution of fraud perpetrators, according to PH3A, include: (a) errors in calculation of housing assistance payments (HAP), (b) application of wrong HUD regulations and termination of assistance letters to tenants, (c) missing signatures on documents, and (d) failure to have current HUD form 9986 (authorization to release information) in the files. PH3A's fraud prevention training manual included information on the aforementioned staff errors that can hinder prosecution of fraud. PH1C shared that having staff brainstorm on a regular basis to recommend policies to implement for fraud prevention and detection was an inexpensive, yet effective antifraud strategy.

PH2B expressed frustrations with some of the HUD regulations that perpetuate tenants to commit fraud, such as the inheritability of the voucher assistance. PH2B and PH3A believed the inheritability feature of the HCV program causes systematic, repetitive mindsets and fraudulent behavior from tenants. PH2B shared a case of a tenant who received a law degree and resigning from a job in order to continue receiving housing subsidy. PH1B, PH1C, PH2A, and PH3A shared the sentiment that the predominant belief of tenants committing fraud is there is nothing wrong with committing fraud because everyone else is committing fraud, so it should not be a surprise to PHA staff. The variables and anticipated effect of the TPB are not relevant to perceptions and intentions (Ajzen & Sheikh, 2016).

PH1C shared some regulatory changes at the national level that might reduce the occurrence of tenant fraud: mandating credit checks of tenants, removing the in-kind family contribution letters, and removing the childcare expense reduction from the income calculation. HUD officials allow tenants to submit notarized childcare expense letters from any type of childcare provider, including family members and valid childcare providers (Ellen, 2018; HUD, 2014; Walter & Wang, 2016). PH1C also suggested removing the interim financial statements of self-employed tenants and only accepting self-employment income reported on income tax returns. Ajzen (2014) asserted that certain behaviors can result in a positive or negative reaction or consequence and behaviors might illicit favorable or unfavorable outcomes.

All participants relayed their belief that a HUD regulatory change at the national level to eliminate the zero-income feature of the HCV program would help alleviate some of the tenant fraud. Participants strongly believed no one is able to live off a zero-income budget, regardless if the tenant pays no rent out of pocket. Participants indicated HUD officials' allowance of a zero-income status perpetuated tenants to commit fraud. HUD regulations include a utility allowance (reimbursement) for families with little or no income (Ellen, 2018; HUD, 2014; Walter & Wang, 2016). Said regulation, according to participants, motivates tenants to claim zero income. The behavioral intentions of an individual are the best indicators of behavior (Chen, 2016; De Leeuw, Valois, Ajzen, & Schmidt, 2015; Gagnon, et al., 2015).

Another area of concern all participants included the need of regulatory changes at the national level to add a requirement for a court-ordered or court-approved document

for the transfer of custody of children. HUD regulations currently only require a

notarized letter signed by the custodial parent, as proof of the transfer of custodianship of

children residing in subsidized housing (Ellen, 2018; HUD, 2014; Walter & Wang,

2016). Consequently, this HUD regulation intensifies the level of fraud risk as it relates

to household composition. The greater the number of individuals residing in a subsidized

unit, the greater the number of bedrooms allowed for the HCV program (Ellen, 2018;

2016; Kleit et al., 2015; Walter & Wang,). States vary in the requirements for showing

the burden of proof of custody for the public school system purposes (Austin, Bow,

Knoll, & Ellens, 2016).

      PH2A and PH2B shared the same sentiment of HUD regulatory changes should

include placing time limits on HCV program eligibility and removing the voucher

inheritability feature from the program. PH2B was adamant about HUD implementing a

work requirement for all adults who are not students, disabled, or elderly. PH2B's idea

included HUD officials instituting an 8-hour monthly community service requirement for

all non-working adults who are not disabled, elderly, or a student. The Public Housing

programs, which are subsidized units a PHA owns, includes a requirement for non-

working adult tenants to complete a minimum of eight community service hours per

month (Ellen, 2018; HUD, 2014; Walter & Wang, 2016). PH2A and PH2B believed that

until the mentality of tenants change from viewing the HCV program as an entitlement or

right, agencies would continue to experience fraud. Specific beliefs of individuals

influence behavioral changes (De Leeuw et al., 2015).

Business executives' norms and attitudes related to combatting tenant fraud.

Participants' norms and attitudes varied toward strategies implemented for combatting

tenant fraud. An individual's perception of the level of risk will shape one's attitude

towards any particular situation (Johnson et al., 2014). Alternatively, in addition to

norms and attitudes, Chen (2016) suggested that an individual's moral obligation should

be included in an extended version of the TPB. The top five most frequently used anti-

fraud strategies cited by participants were (a) review of bank statements and tax

transcripts, (b) use of EIV system, (c) verify family members, (d) improved interviewing

techniques, and (e) automated background software and DMV contacts.

Studies Related to Antifraud Strategies

PHA business executives demonstrated successful business practice strategies by

detecting and reducing the occurrence of tenant fraud in the HCV program. Participants

offered innovative strategies that PHAs could use to combat tenant fraud in the HCV

program. All participants pointed out that uncovering fraud is more than an internal

process, and they relied heavily on community input, via anonymous reports of fraud.

The HUD OIG offers a fraud tip line that individuals may report fraud anonymous (Ellen,

2018; Walter & Wang, 2016). In a study on whistleblowing intentions using the TPB,

Brown et al. (2016) purported that whistleblowing is the most effective detection

technique for accounting fraud. Findings from the whistleblowing study indicated that

attitudes and perceptions of an individual's control over whistleblowing correlate

positively to whistleblowing intentions (Brown et al., 2016). PHA business executives

implemented strategies on tenant fraud detection and reduction. Comparable practices

included (a) detection strategies, (b) verification procedures, and (c) improved interview techniques.

Detection strategies. PHA business executives use an array of strategies to detect tenant fraud in the HCV program. Jacob and Manzi (2014) purported the use of the HUD EIV system is one of the most effective fraud detection strategies for PHA staff to use in combatting the rising incidence of fraud. All of the participants used HUD's EIV system to detect unreported income and fraudulent reported household composition.

The federal government designed the Earned Income Tax Credit (EITC) program to benefit low-income families, via an income tax refund to wage-earning individuals (Jones, 2017; Kim & Maroulis, 2018). As the second largest cash means-tested welfare program, the EITC program provides an opportunity for recipients of subsidized housing to commit dual housing and income tax fraud through the reporting of fraudulent income and household composition (Rector, 2016).

Based on the IRS guidelines for EITC eligibility, a single-parent household could qualify for a higher EITC refund if earned income fell between certain thresholds (Rector, 2016). However, Greenlee (2014) asserted that the family is responsible for a higher family rental obligation when the family claims the income for subsidized housing eligibility purposes. Consequently, the potential higher EITC refund and lower family rental obligation might motivate an individual to commit fraud between the two programs (Greenlee, 2014; Recto, 2016). PH3A reported that their agency had experienced a high incidence of dual housing and income tax fraud. All participants reported the review of

income tax transcripts as an effective fraud detection tool for tenants committing housing fraud.

All participants ranked the review of bank statements as one of the top three tools used for detecting unreported income. Greenlee (2014) purported perpetrators of fraud who received housing assistance are more likely to have discrepancies between banking information and the income information reported to the PHA staff. Participants explained the review of bank statements received from third party confirmations, for repetitive unidentified deposits and large irregular deposits, were important fraud detection techniques.

Other fraud detection tools including requiring tenants who claimed zero income, and single parents reporting no child support, to disclose on a quarterly basis to PHA staff, the source of funds used for non-food expenses. HUD regulations require PHA staff to count the value of non-cash contributions, other than food, as income in the calculation of tenant rental obligations (Nordvik, 2015).

Verification procedures. Participants asserted that the use of consistent and defined verification procedures for tenant income and household composition were the best fight against tenant housing fraud. A review of participants' HCV administrative policies and procedures confirmed PHA management had included a list of documents and information requiring verification. All participants confirmed adult applicants and participants are required to sign form HUD-9886, *Authorization for Release of Information.* The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for

the specific purposes listed on the form (Ellen, 2018; HUD, 2014; Walter & Wang, 2016).

Any documents PHA staff uses for verification should be the original, whenever possible, and typically dated within 60 calendar days of the date tenant provides to the PHA (Webb et al., 2016). HUD officials generally frown upon PHA staff using damaged, altered, or in any way illegible, documents (Ofori-Boadu, Shofoluwe, & Pyle, 2017). PH2A mentioned they would accept documents dated up to six months prior to the effective date of the tenant's reexamination, if the document represents the most recent scheduled report from a source. For example, PH2B shared that if the holder of a pension annuity provides semi-annual reports, the PHA would accept the most recent report.

PH3A suggested allowing enough time between tenant appointments and reviewing past information, via the EIV report, as effective verification procedures. In January 2010, HUD began requiring PHA staff to use the EIV system as a tier 1 procedure for verification of income (French & Ruiz, 2011; HUD, 2014; U. S. GAO, 2014). All participants noted the use of the EIV system was the primary method used for verifying income. The review of income tax transcripts in comparison to data reported on the EIV reports were the second most frequently used verification procedure for income and household composition. All participants noted that tax fraud would result in termination of assistance without recourse.

Another verification procedure of household composition cited by participants, included occupancy information garnered from probation and parole officers for parolees living illegally with HCV tenants. HUD requires verification of income and household

composition for all subsidized housing programs (Grenelee, 2014; Seicshnaydre, 2016; Webb et al., 2016). The type of verification process HUD required is dependent upon the specific type of housing program funded (Grenelee, 2014; Seicshnaydre, 2016; Webb et al., 2016).

Effective interview techniques. The fourth most frequently used strategy to combat tenant fraud was effective interviewing techniques. The purpose of the application or participant interview is to garner complete and accurate information in order to establish tenant eligibility and level of assistance (Jacobs & Manzi, 2014). All participants pointed out that the most important interviewing technique is to build a good rapport with the interviewee, to put the interviewee at ease. Participants PH1C, PH2B, and PH3A noted that the most effective interviewing techniques included (a) using narrow questions to garner specific responses, (b) broad questions, (c) using probing question, and (d) avoiding multiple questions, asking tough questions, (e) allowing ample time for a response, and (f) avoidance of leading the interviewee. I noted during my review of documents that PH3A's fraud prevention training manual encompassed a section on interviewing techniques. The manual included sample scripts for staff to use when interviewing tenants. Hollow (2014), Soltani (2014), and Vanderhallen and Vervaeke (2014) purported the most effective interviewing technique for an interviewer of fraud suspects is to establish a good rapport with suspects.

Application to Professional Practice

PHA business executives might apply these study findings as successful business practices for combating tenant fraud in subsidized housing. Participants offered insight to

professional business practices that correlated to the literature on combatting tenant fraud in subsidized rental housing. Research was lacking on specific strategies for detecting and minimizing tenant fraud in the rental housing market. The strategies shared by participants on detecting and minimizing tenant fraud might augment PHA business researchers' ability to garner similar literature. Business executives might apply the study findings to enhance their practices through (a) tenant fraud prevention, (b) tenant fraud detection, and (c) proposed HUD regulatory changes to reduce tenant fraud.

Fraud Prevention

Fraud prevention begins with the PHA staff and management's awareness of preventative strategies. Tenant fraud prevention is the responsibility of PHA management, employees, and tenants (Montague, 2106). Doig (2014) pointed out prevention is more important than detection, when it comes to reducing fraud. PHA business executives were eager to share information and lessons learned from their fraud prevention efforts.

Some participants had written fraud prevention strategies, while others relied on employees to utilize information garnered from external trainings. PH2A employed a dedicated fraud investigator to focus solely on reducing the occurrence and prosecution of fraud. PH2A and PH3A held consistent structured internal fraud prevention training for staff. PH1A relied more heavily on external fraud prevention training for staff. Rahman and Anwar (2014) asserted that fraud prevention begins with management implementing and enforcing fraud prevention policies with employees. I reviewed PH1A's HCV administrative policy, which did not include specific information on fraud prevention.

PH1's policy included the eligibility process, procedures for verifying information, and the termination of housing assistance process. I reviewed PH3A's HCV policy, and it included a section on fraud prevention. PH3's fraud section defined fraud, provided red flags to detect fraud, and identified steps to verify information provided by tenants. PH2A had a separate fraud prevention and detection policy and manual for staff. PH3A shared that their personnel policy included progressive disciplinary action for employees failing to adhere to agency policies.

Fraud Detection

Most of the participants demonstrated aggressiveness toward implementation of fraud detection techniques. Business executive develop effective fraud detection techniques that identify new and traditional types of fraud (Liu et al., 2015; Tan et al., 2015). I reviewed PH2's fraud prevention manual that included verification procedures and red flags for fraud detection. Some of the red flags include rejecting any documents presented by a tenant that appears altered, damaged, or illegible. PH1C suggested a tenant having an expired driver's license might also be a red flag indicating fraud. According to PH2A and PH2B, tenants operating an Airbnb out of a subsidized unit are on the rise in central Florida. PH2B detected some fraud from driving by subsidized units and conducting random interviews under the pretense of interested buyers. PH3A used public records as a source of detection of ineligible members occupying the household.

PH1C showed me a sample supplemental newspaper, *Mugshots*, which included recent arrests within the previous 72 hours. The publication included the individual's name, date and time of arrest, bail amount, and type of offense. According to PH1C, staff

reviews the arrests listing weekly for comparison to the PHA's database of assisted households. PH2B noted the review of *Mugshots* as a fraud detection technique. However, PH2B cautioned against the benefits versus the costs when calculating the amount of staff time necessary to search the PHA's database for any individuals listed in *Mugshots*. When sharing information about using *Mugshots* as a fraud detection tool, PH2B and PH3A argued that dividing tenants up between assigned caseworks, the majority of the caseworkers became familiar with their respective tenant caseload and could easily note any tenants reported in *Mugshots*. HUD's One Strike regulation includes certain criminal activities that HUD officials expressly prohibit eligibility for any PHA housing program (Walter, Viglione, & Tillyer, 2017).

Experienced perpetrators might circumvent secure internal controls (Othman, Aris, Mardziyah, Zainan, & Amin, 2015; Shore, 2018). Participants reported they diligently observed the vehicles, attire, hair, jewelry, and nails of tenants during eligibility appointments, as a red flag indicator of potential unreported income. Flint (2016) suggested low-income families of subsidized housing driving an expensive vehicle might be an indicator of unreported income. One of the most prevalent red flags for the detection of fraud from unreported income noted by all participants was of tenants claiming zero income.

Proposed HUD Regulatory Changes to Reduce Tenant Fraud

All participants stressed the need for regulatory changes at the federal level to reduce tenant fraud in the HCV program. Participants provided an assortment of strategies used to combat tenant fraud in their respective agencies. PH1A, PH2A, and

PH3A stressed the importance of having qualified and experienced employees. PH1C required tenants to provide court documents to verify non-biological children living in the household. The larger the family size, the higher number of bedrooms a family will qualify in the HCV program (Collinson & Ganong, 2018; Greenlee, 2014; Phillips, 2017). PH2A and PH2B require tenants to provide proof of unauthorized household members have relocated from the subsidized unit, such as a written lease for a unit in another location and three pieces of mail to document the new address. HUD regulations require PHA staff to determine program eligibility on all occupants of subsidized units (Webb et al., 2016).

PH1B advocated for the federal government mandating credit checks to detect household expenses that might require additional family income. PH3A suggested HUD mandate the use of credit reports as a fraud detection tool of unreported income. Miller (2015) purported that properly evaluating credit reports might yield indicators of additional household income from the evidence of consumer debts.

PH1B suggested the prohibition of notarized letters for claiming childcare expenses, and require the tenant to submit expenses childcare provider's letterhead, and PHA the staff verify information. PH1B also suggested HUD regulators implement a cap on the maximum amount of childcare expenses claimed by tenants. The higher the childcare expenses claimed, the lower the family's adjusted income used to calculate the tenant's rental obligation (Walter & Wang, 2017).

PH1C advocated for changes at the national level include allowing the amount of net self-employment income reported on the income tax transcript, and cease with

allowing interim profit and loss statements for verification of income. According to

PH1C, HUD regulators' failure to place a cap on the number of years able-bodied

families receive housing assistance will continue to perpetuate the increase of fraud.

Advocacy housing groups are working on a national legislative level to introduce policy

reform for the HCV program, to include placing a cap on the number of years able-bodied

families receive assistance (Graves, 2016). One of HUD's requirements for lease renewal

for residents of the public housing program is to require all adult, non-working household

members to perform eight hours of community service monthly, or 96 annually

(Collinson & Ganong, 2018). Exempt individuals of the community service requirement

include the elderly, disabled, working, and those in school (Collinson & Ganong, 2018).

Participant PH2A explained that the value of in-kind family contributions used in

the calculation of income is restricted for a minimum of 12 months when calculating

rental assistance. Participants advocated including this strategy as a regulatory change at

the national level for PHAs. Some tenants fraudulently report family contributions in

order to reflect a higher income at the eligibility phase in order to qualify for a larger

rental unit ((Ellen, 2018; Seicshnaydre, 2016, HUD, 2014). After initial occupancy, some

tenants will report they no longer receive the family contribution so their rental obligation

will decrease and the PHA's assistance will increase (Collinson & Ganong, 2018;

Greenlee, 2014). Requiring the family contributions be included for a minimum of 12

months might deter some tenants from reporting fraudulent income.

PH2A and PH2B advocated HUD regulators placing a cap on the number of years

able-bodied families receive housing assistance. They were in favor of HUD executives

allowing exemptions to the participation cap for elderly and disabled families. PH2B was strongly opposed to the inheritance feature of vouchers. In the event of death of the head of household member, current HUD policies allow for the transfer of vouchers to other adult household members (Hanlon, 2015). PH2B suggested Congress should grant subpoena power to PHA executives to facilitate a more expedient and effective fraud investigation. Congress granted subpoena powers to the HUD OIG for investigative purposes (Johnson, 2014).

Including the tenant debts owed to housing authorities on the perpetrators' credit reports, according to PH2B, would serve as a deterrent to fraudulent activities. Once PHA staff enters a family into the HUD tenancy system as being assisted by a PHA, the HUD EIV system will automatically send alert emails to a PHA's executive point of contact, of any family owing monies to another PHA (French & Ruiz, 2011; Green, 2015; McClure et al., 2014). However, the system does not automatically report the information to the credit reporting agencies (Green, 2015; McClure et al., 2014). PHA executives have the autonomy of reporting information to the credit reporting agencies (Green, 2015; McClure et al., 2014).

Although the use of the EIV system is an effective strategy for fraud detection, participants complained that the current HUD guidance on using the EIV system is cumbersome. Participants concurred that the use of the EIV in eligibility determination, recertification, and terminations should be deregulated and streamlined. Participants suggested that streamlining the EIV process might save program resources because of saved administrative time with processing.

According to PH3A, conducting an internal audit of 100% of HCV cases has proven to be an effective strategy for reducing fraud. From a review of PH3A's internal control policy, I determined it included sample checklists used for internal auditing of files. The audit checklist encompassed required file documents and a computation form to verify staff had computed rent and income accurately. Acknowledgement of staff verification of certain documents was included on the audit checklist. The audit checklist also contained questions requiring a yes or no response acknowledging signatures and dates on forms.

As an early detection of fraud, PH3A requires staff to review various HUD reports on a weekly basis for duplication assistance (i.e., HUD Deceased Tenants, HUD Duplicate Social Security Numbers report, Income discrepancy report). I reviewed sample HUD reports, such as the deceased tenant report and HUD duplicate social security number reports, provided by PH3A. Participants required their HCV management or compliance staff to review these reports on at least a minimum basis. The deceased tenant report includes the name, social security number, date of birth, and date of death for any tenants of a respective PHA, who had died, but is still in the system as active.

The duplicate social security number report reflected the names and social security number for tenants with duplicate social security numbers. PH2B explained that the follow-up research procedures include staff reviewing social security cards in the tenant file and noting the documents were the same as those reflected in the report. If the numbers were the same, then staff would send a third-party verification request form to

the Social Security Administration office to validate the correct tenant. Participants

shared that they terminated housing assistance of tenants using fraudulent social security

numbers.

The income discrepancy report (IDR) is a mechanism PHA business executives

use to identify families who may have hidden or under-reported income (McClure et al.,

2014). PH2B explained that data in the IDR represents income for past reporting periods

(HUD, 2014). The information may be between 6 - 30 months old at the time the system

software generates the IDRs. In certain cases, the IDR may also reveal families who have

not concealed or under-reported income, such as loss of a job or new family member

addition (Seicshnaydre, 2016).

As a part of the internal staff training, PH3A use staff role-playing of various

fraud case scenarios and interviewing techniques to demonstrate effective fraud detection

techniques. In order to detect income and household composition discrepancies, PH3A

trains staff to review the case file and EIV system report prior to meeting with a tenant.

From a review of PH3A's fraud prevention training manual, I could readily determine it

included detailed instructions on comparing EIV reports to information provided by

tenants (i.e. check stubs, tax transcripts, etc.). According to PH3A, fraud indicators

included any discrepancies between the tax transcript, EIV report, and or check stubs,

such as income reflected on one report and not the other.

PH3A was vehemently against the EITC option for taxpayers and strongly

believes if Congress eliminated it, then the reporting of bogus businesses and tenant fraud

would decrease significantly. The EITC is the biggest cash assistance program for low-

income families, often motivating many to commit fraud (Sykes, Križ, Edin, & Halpern-Meekin, 2015). If HUD regulators placed a 5-year cap on housing assistance for able-bodied families and required them to work while receiving assistance, PH3A believes PHA executives would quickly see a reduction in tenant fraud.

In order to improve the collection time of income data, PH3A suggested the federal government provide PHA staff access to the IRS and Department of Labor's information. Data reported in the EIV system is four to six months behind, often creating a lag time in fraud detection to the subsequent annual tenant recertification process (Green, 2015; McClure et al., 2014). PH3A also advocated HUD regulators including the tenant debts owed to housing authorities on the credit reports.

All participants suggested HUD regulators prohibit the use of a notarized letter to claim (disclose) additional income. A notarized letter does not authenticate the information is truthful or accurate, it only validates the individual signed the letter in the presence of a notary (Lo, Wu, & Chuang, 2017). PH1A shared that tenants with fraudulent intentions often use notarized letters to disclose additional income from family contributions in order to qualify for a larger unit at the initial occupancy eligibility process. Once PHA staff determines eligibility for a certain size unit, the tenant with fraudulent intentions typically submit an income change the following month, reflecting a loss of family contributions. HUD regulations require PHA staff to recalculate housing assistance when there is a change in family's income (Hanlon, 2015).

Implications for Social Change

By detecting and eliminating fraud, opportunities exist for positive social change leading to an increase in economic resources and economic growth in the United States. Preserving housing after the housing market crash of 2008 became one of the most critical and underserved needs of society (Tucker, 2014). The reduction of fraud in the public housing sector would likely result in an increase of available funding in other vital federal government public services.

Fraud detection might yield the following benefits: (a) reduction of exposure to fraudulent transactions, (b) reduction in costs related to fraud, (c) improved organizational control, and (d) identification of employee vulnerability to fraud risk (Rahman & Anwar, 2014). Study findings might contribute to minimizing the occurrence of under-reported income, identifying ineligible households, and reducing the amount of fraud, waste, and abuse in the HCV program. The findings of this study might add to the body of knowledge and further contribute to social change through a coalition of PHAs working together to share their knowledge of combatting tenant fraud in the HCV program.

All participants reported a reduction in the level of fraud since implementing some of the anti-fraud strategies noted in this study. PH1C believed the implemented strategies are effective in curtailing fraud, but needed additional brainstorming and fine-tuning. PH2A reported that during the period of 2000 – 2017, the agency experienced a fraud detection rate of 33%, and 50% of the detected cases resulted in termination of housing assistance. For the period 2012 – 2017, PH3A reported the agency's fraud has

decreased two to five percent. PH3A also reported the time required to detect fraud has

decreased significantly due to the strategies management has implemented in the agency.

In contrast, unreported income fraud cases in PH3 had increased significantly.

Participants shared copies of their internal and external audit reports for me to

review in their presence. Upon completion, I was required to return the reports to

participants, and the participants requested not to make notes concerning their respective

audit reports.

<div align="center">**Recommendation for Action**</div>

The qualitative multicase study involved exploring strategies to combat fraud in

the subsidized rental housing market, specifically the HCV program. Graves (2016)

advocated for definite changes that might be measurable and achievable in the HCV

program. Housing advocacy groups such as the National Association of Housing and

Redevelopment Officials (NAHRO), and its state counterpart, FAHRO, have been

working to push new legislation through Congress to improve the efficiency and

effectiveness of the HCV program (Walter & Wang, 2017). Business executives cannot

afford to overlook the growing problem of fraud in the HCV program (Graves, 2016).

Recommendation 1: Use Bank Statements and Income Tax Transcripts

Based on study findings, I recommend PHA business executives include in their

business practice model for fraud prevention a review of bank statements provided by the

family's bank of business through third-party verifications. Participants in this study

suggested that reviewing the three most recent months of bank statements for irregular or

repetitive unidentified deposits and withdrawals aids PHA staff in the detection of

unreported income. I also recommend comparing the regular deposit amounts reflected on bank statements to the income reported on the eligibility application. Staff should investigate any discrepancies noted between the bank statements and applications. Business executives should pay close attention to PayPal transactions.

I further recommend PHA business executives review income tax transcripts that IRS staff generates instead of tenant-generated income tax transcripts. Business executives should require income tax transcripts for all adult household members, including those reporting zero income. I do not recommend using income tax returns provided by the tenants because tenants could easily submit fraudulent tax returns that they have prepared themselves. Tax transcripts will authenticate all income reported to the IRS by all sources. Tax transcripts can identify members of the household.

Recommendation 2: Use HUD's EIV System to Determine Household Income

Findings from this study lead to recommending the use of HUD's EIV system to determine household income. Since data reported in the EIV system is four to six months behind schedule, I recommend staff compare the EIV reports to the eligibility application and six consecutive check stubs provided by the tenant, or third-party income verification letters. If discrepancies exist, I recommend staff request third-party income verification, or use the work number system to authenticate income. Business models should include the requirement for staff to review the EIV reports with tenants and require tenant's signature for concurrence of data accuracy. I strongly advocate PHA management require caseworkers to meet, on at least a bi-monthly basis, with families reporting zero income,

to review household expenses and sources of income and in-kind contributions counted as income.

Recommendation 3: Verify Household Composition

Another recommendation from the data analyzed, such as check stubs, multiple subsidy reports, EIV reports, and deceased tenant's reports, is that PHA business executives should verify all household members using a variety of sources. For school-age children, I recommend requiring school registration records from a third party on an annual basis to validate children residing in the household. I suggest using local county court records to validate non-biological children of the household. A local county public records search and postal system inquiry are good resources to use for identifying household members. I suggest requiring third-party verification for adding or deleting any family members to the subsidized voucher.

A public records search might reveal undisclosed marriages, names of fathers, and information on traffic tickets to determine addresses used by tenants. For absentee fathers, I recommend third-party verification of child support payments, via the local child enforcement agency. I also encourage staff to consult with probation and parole officers to document unauthorized guests living in subsidized properties. PHA policies should require a copy of current driver's licenses or government phot identification of all adult household members on an annual basis. HUD regulators require criminal background checks of all adult household members (Dickson-Gomez, McAuliffe, Obidoa, Quinn, & Weeks, 2016). It is important to prohibit individuals with certain criminal offenses from receiving housing subsidies (Dickson-Gomez et al., 2016).

Recommendation 4: Use Effective Interview Techniques

PHA business executives might enhance their staff's fraud detection techniques by conducting regular biweekly or monthly staff meetings to discuss cases and brainstorm on policies and procedures. I recommend management conduct internal training for interviewing techniques with staff on a regular basis. Participants suggested role-playing with staff during training to improve interviewing skills.

Staff should use the following techniques when interviewing tenants: (a) broad questions, (b) narrow questions to garner responses, (c) probing questions for follow-up, (d) avoid multiple questions, (e) allow adequate time for responses, (f) avoid leads and cues when presenting questions, and (g) ask tough questions. It is paramount to effective interviewing for staff to schedule enough time between appointments to review past information reflected on applications and EIV reports. During interviews, I recommend staff closely observe tenant's attire, hair, nails, jewelry, cell phones and other electronic equipment, and vehicles driven to appointments, as potential red flags of undisclosed income. Hill (2017) asserted that the tone of the work culture from the top hierarchy could present pressure on lower level employees to commit fraud in order to meet mandated quotas. Hill further alluded to the behavior of perpetrators might be influenced by the pressured feeling to succeed.

As budgets permit, staff should receive external training on an annual or biennial basis. I believe PHA management should switch caseload between caseworkers on at least an annual basis in order to increase fraud detection by a second review of files. I

advocate for business executives conducting internal file audits and individualized coaching sessions with staff.

Recommendation 5: Use Automated Background Software and DMV Reports

Lastly, I recommend PHA business executives use an automated background check software, such as *Clear* or *LexisNexis*. Participants noted that automated background software provided thorough background checks through public records, utilities, voter registration identification, and DMV searches on tenants. I encourage business executives to form partnerships with local DMV agencies and social welfare agencies for the exchange of information on mutual clients. Doig (2018) purported agencies should work together to develop a national fraud strategy that will address fraud from a global perspective by sharing resources, strategies, and experiences.

My distribution plans include sharing this study at housing conferences, housing coalition training, and seminars, via online and in-person. I plan to provide participants with a copy of the entire study, including findings and results. I also would like to provide a copy of this study to the HUD OIG. The public will have access to the study through doctoral-research-based publication.

Recommendations for Further Study

Ajzen derived the TPB in 1985 from an expansion of the theory of reasoned action, which Fishbein proposed in 1980 (Ajzen, 2015). Researchers studying the theory of reasoned action focused on the high correlation of individual attitudes and subjective norms to what provoked certain behavioral intentions (Ajzen & Sheikh, 2016). The literature on the detection and reduction of tenant fraud in subsidized rental housing,

especially the HCV program, was very limited. I recommend further qualitative research

on effective strategies to combat tenant fraud in the rental housing market using the TPB.

Current studies on anti-fraud strategies might augment the qualitative findings noted in

this study. In order to develop better strategies to address the problem of tenant fraud, I

also recommend conducting additional research to explore the attitudes and beliefs of

tenants that commit housing fraud.

Limitations Related to this Study

One of the biggest limitations of this study is the PHAs were located in central

Florida. Findings may potentially not be transferrable to another geographic location or

other federally subsidized housing programs. I recommend conducting further research in

south Florida, where a larger pool of PHAs exist to choose from and there are more

reported incidences of fraud, as well as language barriers. Participant and researcher bias

was a second limitation. As the CEO of a PHA in Florida, I had to extend concerted

efforts to mitigate any potential biases during my research and interpretation of findings.

However, after conducting the interview process, I discovered having PHA management

experience was instrumental in understanding the program, and acronyms and

assumptions used by participants. To help mitigate any personal biases, I followed strict

adherence to the interview protocol I developed (see Appendix A). I also used

triangulation and member checking to help mitigate researcher's biases. According to

Leung (2015) and Yin (2014), and Yin (2015), the participants' biased responses to

interview questions and researchers' biased interpretation of the data, have an effect on

research findings.

Sample size was another imitation of this study. Study participants consisted of six business executives of three PHAs. A more in-depth diverse group might have resulted in a greater diversity of opinions and perceptions of participants. The fourth and final limitation is that the results of the study might not be transferable to the HCV program that every PHA administers.

Reflections

My decision to research strategies to combat tenant fraud in the rental housing market emerged from my interest and experience of working 19 years as the CEO of a large PHA. I have witnessed the increase of tenant fraud in PHAs, especially in the HCV program. There was no one resource available that a business executive might refer to for comprehensive guidance in fighting tenant fraud. Research identifying specific strategies to detect and minimize fraud was lacking.

To add validity to the study, I coded the keyword phrases participants used during the interview process. As a follow up to the interview process, I used member checking to enhance reliability and validity of the data instruments used in the study. Upon completion of transcription by a third party, I requested the participants review the transcribed interviews for accuracy. I ensured data saturation occurred after completion of the interview process to confirm there was no new information. I listened attentively and paid careful attention to participant responses to determine the point when responses became redundant that signaled that I had reached data saturation.

The information I garnered during the interview process was invaluable to me in my current position. The participants appeared contented that I had foreknowledge and

experience working in the HCV program. I had to be very conscious of any personal

biases that emerged, especially during the interview process and written analysis of

findings. Following the interview protocol precisely was a big aide in guiding me

through the process in an impartial perspective.

This doctoral journey required perseverance, tenacity, and self-motivation. There

were times when I felt my strength and willpower were weakening and I became

discouraged. However, despite the obstacles and challenges I endured, I prayed daily and

persevered to remain focused and committed to finishing this arduous task. I have

learned the importance of collaboration with other colleagues for the exchange of

valuable feedback and motivation. I maintained a close connection with, and reliance on

the mentorship and guidance from my Chair, which I found was paramount in completing

this journey. My research and scholarly writing skills have noticeably improved. I have

grown as a researcher and become a more critical thinker in the process.

Summary and Study Conclusion

The purpose of this qualitative multicase study was to explore strategies business

executives use to combat tenant fraud in the rental housing market. Existing research on

this topic was limited. I used data from conducting semistructured interviews, and

reviewing HUD reports and HCV program policies, procedures, and fraud prevention

manuals. I found a menu of successful strategies for the detection and prevention of

tenant fraud in the HCV program, which business executives might also apply to other

housing programs. Participants shared strategies that might contribute to reducing the

amount of fraud, waste, and abuse in the HCV program. The five most widely used

successful strategies included: (a) review of bank statements and income tax transcripts,

(b) use of HUD's EIV system, (c) verification of household members, (d) use of effective

interview techniques, and (e) use of automated background software and DMV reports.

The findings of this study might add to the body of knowledge and further contribute to

social change.

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Appendix A: Interview Protocol

Participants will email or mail a copy of their informed consent form, or acknowledge consent to participate, via email, as an uncompensated volunteer. The participants will be allowed to select the interview date, time, and place. I have developed the interview protocol below to preserve the integrity of the interview process of capturing the participants' delineation of successful strategies implemented for combatting tenant fraud in the rental housing market.

1. I will begin the interview by introducing myself with the statement, "*Good morning/afternoon, I am Gwendolyn Dawson, a doctoral student at Walden University, and thank you for your participation in this research*". I will acknowledge the participants have signed the informed consent form.

2. I will inquire if the participants have any questions.

3. After answering any participants' questions, I will request permission to audio record the interview.

4. Upon receiving permission to audio record the interview, I will begin protocol 6.

5. If the participants do not agree to audio recording of the interview, then I will not record and will state the following: *"Thank you (participant's name). I respect your decision. I will need to take written notes in my journal to capture your responses and interpretations of the strategies you have implemented to combat fraud in your HCV program". "The interview may take a little longer to allow for adequate time to note your responses. Are you still willing to participate?"*

6. Begin the audio recording.

7. The opening remarks will include *Welcome, and thank you again for agreeing to participate in this important study. As a reminder, your participation is voluntary and no compensation is provided"*.

8. *I know your time is valuable, and the interview should take approximately 30 to 60 minutes. Are you agreeable to the estimated time for the interview?"*

9. I will provide the participants with reassurance that their responses will remain confidential from anything outside of the research project. *Ms. /Mr. (participant's name), I will maintain confidentiality for your responses. I will not disclose your identity nor the identity of your agency in the study"*.

10. Confirm the participants have received an email copy of the informed consent form. *"Did you receive an email copy of the consent form? The consent form included Walden Institutional Review Board (IRB) number for this study, and contact information for the Committee Chair for this study if you have any additional questions you wish to keep private"*.

11. *"Are you still willing to participate?"* If the participant answers in the affirmative, then I will continue with the interview at protocol 12. If the participant states he or she wishes not to continue the interview, then I will end the interview and express my gratitude for his or her time.

12. Explain the purpose of the study. *"The purpose of this research is to explore strategies you have implemented to combat tenant fraud in the rental housing market"*.

13. *"The format of this interview includes open-ended questions. Please feel free to provide any additional information or clarification as we proceed in the interview"*.

14. Statement of consent and procedure for withdrawing from the interview process: *"(Participant's name), as a reminder, this interview strictly voluntary, and please feel free to decline to answer any question that may make you feel are too personal or makes you feel uncomfortable. You may withdraw your consent to participate in the study at any time during the interview, or later. If you decide to withdraw, then all recorded information, notes, and other documents, will go through Walden University's required destruction process. Your withdrawal from the study does not in any way reflect negatively on you or affect your professional standing"*.

15. I will ask the participant if he or she received the list of interview questions that I included in the informed consent form that I emailed. Begin asking the interview questions. I will watch for non-verbal ques, paraphrase questions as needed, and ask follow-up questions to get more in-depth information. I will use the following semistructured interview questions to allow participants to explain their in-depth experiences and knowledge regarding the problem of rental housing tenant fraud and abuse in central Florida.

9. How have you perceived the problem of tenant fraud and abuse in the Housing Choice Voucher (HCV) program?
10. What have been your specific experiences regarding tenant fraud and abuse in the HCV program?
11. How have the tenant fraud cases you have been involved in, revealed the perpetrators' attitude correlated to what provoked their fraudulent behavior?
12. How have the tenant fraud cases you have been involved in, revealed the perpetrators' belief system correlated to what provoked their fraudulent behavior?
13. What specific strategies have you implemented to detect and minimize tenant fraud in the HCV program?
14. In your estimation, how effective were the anti-fraud strategies you implemented?
15. What regulatory changes do you believe are necessary at the national level to help develop effective strategies for combating tenant fraud in the HCV program?
16. What other information, if any, would you like to share concerning HCV program implementation or the success or failure of antifraud actions?

16. After participant answers all questions, provide appreciation: *"Thank you very much (participant's name) for your time and participation in the interview today for this study"*.

17. Advise participant that I will send them a copy of the interview transcript of the audio recording: *"I will mail you a copy of the transcribed audio recording. Upon receipt of the transcription, please review it for accuracy, sign your acknowledgement of the document, and return to me, via the email address provided in the informed consent form. Thank you again for your time and for freely sharing strategies you have implemented to mitigate fraud in rental housing"*.

Appendix B: Interview Questions

The following semistructured interview questions are included in this qualitative

case study. The focus of Question 1 is on the problem statement. Questions 3 and 4

relate to aspects of the perpetrators who commit tenant fraud. Questions 5, 6, and 7

ensure an in-depth interview. Question 8 is a probing question to ensure a rich, thick

examination of the study phenomenon.

1. How have you perceived the problem of tenant fraud and abuse in the

   Housing Choice Voucher (HCV) program?

2. What have been your specific experiences regarding tenant fraud and abuse

   in the HCV program?

3. How have the tenant fraud cases you have been involved in, revealed the

   perpetrators' attitude correlated to what provoked their fraudulent behavior?

4. How have the tenant fraud cases you have been involved in, revealed the

   perpetrators' belief system correlated to what provoked their fraudulent

   behavior?

5. What specific strategies have you implemented to detect and minimize tenant

   fraud in the HCV program?

6. In your estimation, how effective were the anti-fraud strategies you

   implemented?

7. What regulatory changes do you believe are necessary at the national level to

   help develop effective strategies for combating tenant fraud in the HCV

   program?

8. What other information, if any, would you like to share concerning HCV

   program implementation or the success or failure of antifraud actions?