



OFFICE OF INSPECTOR GENERAL
U.S. Department of Housing and Urban Development

February 16, 2022

The Honorable Gerald Connolly
2238 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Connolly:

Please find attached an advance copy of our office's Audit Report No. 2022-CH-0002, entitled, "HUD's Transitioning of Offices from Mandatory to Maximum Telework During the COVID-19 Pandemic," which we initiated in response to your June 2020 letter. We focused our audit on whether HUD complied with its initial internal guidance¹ when transitioning offices from mandatory to maximum telework during the COVID-19 pandemic, allowing HUD employees to voluntarily to return to an office if certain conditions ("gating criteria") were met.

The gating criteria for geographic areas identified by HUD's internal guidance included downward trends associated with: (1) influenza-like illnesses and cases of COVID-like illness, (2) documented COVID-19 cases, and (3) the prevalence of positive tests, as well as the capacity of local hospitals to treat all patients without crisis care, and existence of robust testing programs for its healthcare workers. We selected the following 7 of the 24 offices that HUD had transitioned to maximum telework as of October 5, 2020: Bangor, ME, Des Moines, IA, Albany, NY, Miami, FL, Seattle, WA, Atlanta, GA, and headquarters in Washington, DC.

We found that the reentry memorandums prepared for these offices did not always sufficiently address that the gating criteria had been met before HUD approved the offices to transition from mandatory to maximum telework. We also found that HUD did not (1) provide sufficient documentation to support that the gating criteria were met and (2) establish metrics for determining whether the offices met the gating criteria required to transition. For example, all seven memorandums did not sufficiently address whether documented COVID-19 cases and the prevalence of positive tests had been trending downward for 14 days before the offices transitioned to maximum telework. Further, regional administrators for two offices recommended transitioning the offices, although all tasks required—such as those associated with restroom social distancing and cleaning—had not been completed. We determined these conditions existed because HUD did not have sufficient policies and controls to ensure that applicable gating criteria were met in the geographic areas where offices were located and required actions were sufficiently completed before transitioning offices.

¹ "Resuming Normal Operations Guide, COVID-19 Response, for Headquarters and Field Offices," issued June 2020.

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To address these concerns, we recommended that HUD ensure that future policies and guidance developed to return HUD's offices to normal operations include the specific criteria, metrics, and defined geographic area to be used by all offices as applicable. We also recommended that HUD develop and implement sufficient policies and controls to ensure that applicable criteria in any future guidance are met and all safety measures are sufficiently completed before returning HUD's offices to normal operations and sufficient documentation is maintained to support that the applicable criteria were met.

We note that on December 18, 2020, while our audit was ongoing, HUD provided additional guidance to regional administrators and deputy regional administrators regarding how they should document and support that gating criteria were met in future reentry memorandums. This guidance also stated that the data to support that the gating criteria had been met should come from one or more of the following sources: a local health department, a county or State COVID 19 website, or the Centers for Disease Control and Prevention. Further, in response to HUD OIG's recommendations, HUD expressed its commitment to workforce and workplace safety and following guidance and directives from the Office of Management and Budget, Safer Federal Workforce Task Force, and Centers for Disease Control and Prevention in developing its reentry policy and procedures. We look forward to working with HUD during the audit resolution process to address the recommendations.

If you or your staff have additional questions about our report, please do not hesitate to contact me or our Director of Congressional Affairs, Kathleen Hatcher, at khatcher@hudoig.gov.

Sincerely,

A handwritten signature in black ink that reads "Rae Oliver Davis". The signature is written in a cursive, flowing style.

Rae Oliver Davis
Inspector General