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May 9, 2023

The Honorable Marcia L. Fudge
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, DC 20410

Priority Open Recommendations: Department of Housing and Urban Development

Dear Madam Secretary:

The purpose of this letter is to provide an update on the overall status of the Department of Housing and Urban Development's (HUD) implementation of GAO's recommendations and to call your continued personal attention to areas where open recommendations should be given high priority.[1] In November 2022, we reported that, on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.[2] HUD's recommendation implementation rate was 78 percent. As of May 2023, HUD had 96 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our June 2022 letter, HUD has implemented five of our 11 priority recommendations.

- In July 2022, HUD designed and implemented a policy to analyze the effects of Moving to Work program flexibilities on tenants in the Public Housing and Housing Choice Voucher programs, in response to our January 2018 recommendation.[3]

- As of March 2023, Ginnie Mae (HUD) had implemented an alternative compensation structure known as Critical Position Pay to help manage its growing operations and identified mission-critical occupations to hire in fiscal year 2023. Ginnie Mae also completed an analysis of the optimal mix of contractors and in-house staff and determined it will shift some staff from contractor to in-house status for its operations starting in fiscal year 2023. Ginnie Mae completed its review of the benefits and costs of its contract administration options, assessed the value of alternative arrangements, and

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[1]Priority recommendations are those that we believe warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

[2]GAO, *Performance and Accountability Report: Fiscal Year 2022*, GAO-23-900398 (Washington, D.C.: Nov. 15, 2022).

[3]GAO, *Rental Housing: Improvements Needed to Better Monitor Moving to Work Demonstration, Including Effects on Tenants*, GAO-18-150 (Washington, D.C.: Jan. 25, 2018).

made determinations on hiring positions to oversee ongoing contracting needs. These actions resulted in implementation of three of our priority recommendations from April 2019.[4]

- In April 2023, HUD published a Notice of Funding Opportunity for a Lead Risk Assessment Demonstration. The demonstration will provide competitive grants for public housing agencies to evaluate lead paint hazards (through risk assessments and lead hazard screens) in Housing Choice Voucher units constructed before 1978 where children under the age of 6 reside or could reside. The results of this demonstration will inform HUD's decision whether to request new authority from Congress to amend inspection standards. These actions are broadly consistent with and responsive to our 2018 recommendation.[5]

We ask for your continued attention to the remaining six open priority recommendations. We are adding five new recommendations as priorities this year, related to homelessness, disaster recovery, and cybersecurity. This brings the total number of priority recommendations to 11. (See enclosure for the list of recommendations and actions needed to implement them.)

The 11 priority recommendations fall into the following six major areas:

Improving data collection on homelessness.

Counting the homeless population is a longstanding challenge. In June 2020, we recommended HUD conduct quality checks on data-collection methodologies for the Point-in-Time count and assess and enhance the assistance it provides on data collection. By strengthening its oversight and guidance in these two areas, HUD could further improve the quality of data on homelessness.

Addressing challenges in federal disaster recovery efforts.

Each year, natural disasters affect hundreds of American communities and the federal government provides billions of dollars to support community recovery. In 2021 and 2022, we made four recommendations to HUD to address challenges affecting federal disaster recovery efforts. They include (1) better managing fragmentation between its disaster recovery programs and other federal programs, (2) developing and implementing an interagency plan to identify barriers to accessing disaster recovery assistance, and (3) developing processes to be used within and across federal disaster recovery programs to address identified access barriers and disparate outcomes. Implementing these recommendations could improve service delivery to disaster survivors and communities, reduce federal fiscal exposure, and improve the effectiveness of recovery efforts.

We also recommended that HUD require Community Development Block Grant Disaster Recovery grantees to collect and analyze data needed to monitor the timeliness of their housing

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[4]GAO, *Ginnie Mae: Risk Management and Staffing-Related Challenges Need to Be Addressed*, GAO-19-191 (Washington, D.C.: Apr. 3, 2019).

[5]GAO, *Lead Paint in Housing: HUD Should Strengthen Grantee Processes, Compliance Monitoring, and Performance Assessment*, GAO-18-394 (Washington, D.C.: June 19, 2018).

activities and inform corrective actions. By doing so, HUD could better ensure that its grantees identify problem areas and take corrective actions.

Addressing cybersecurity challenges.

The protection of personally identifiable information—such as birthdates and Social Security numbers—has become a significant issue in recent years. In September 2022, we recommended HUD incorporate privacy into an organization-wide risk-management strategy that includes a determination of risk tolerance. Doing so would give HUD greater assurance that it will manage privacy risks within acceptable thresholds.

Improving Real Estate Assessment Center's physical inspection process.

HUD's inspections continue to find properties in poor physical condition and with life-threatening health and safety issues. Congress and the media also raised concerns about properties that may have received inspection scores inconsistent with their physical condition. In March 2019, we recommended a comprehensive review of the inspection process. Implementing this recommendation would improve the identification of physical deficiencies at HUD multifamily properties (including public housing).

Strengthening processes to address lead paint hazards.

Exposure to lead paint hazards can cause serious harm to children under 6 years old. In a June 2018 report, we made two recommendations for HUD to enhance compliance monitoring and enforcement of lead paint regulations. Implementing these recommendations would improve HUD's efforts to identify and address lead paint hazards in low-income housing.

Improving IT management.

HUD has shortcomings in its IT management capability and limitations in the systems supporting its mission. In December 2014, we recommended that HUD develop a process to enable the agency to identify IT governance actions and projects that achieve cost savings and efficiencies. Implementing this recommendation would improve HUD's IT management.

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In April 2023, we issued our biennial update to our High-Risk List, which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.[6] One of our high-risk areas—resolving the federal role in housing finance—relates directly to HUD.

Several other government-wide high-risk areas also have direct implications for HUD and its operations. These include (1) improving the management of IT acquisitions and operations, (2) improving strategic human capital management, (3) managing federal real property, (4)

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[6]GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to be Maintained and Expanded to Fully Address All Areas*, GAO-23-106203 (Washington, D.C.: Apr. 20, 2023).

ensuring the cybersecurity of the nation,[7] and (5) managing the government-wide personnel security clearance process.

We urge your attention to resolving these government-wide high-risk issues as they relate to HUD. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within HUD. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.[8]

In addition to your continued attention on these issues, Congress plays a key role in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.[9]

There are various strategies Congress can use in addressing our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on HUD's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for HUD to act. Moreover, Congress can follow up during the appropriations process and request periodic updates. Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees. In addition, the report will be available on the GAO website at https://www.gao.gov.

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[7]With regard to cybersecurity, we also urge you to use foundational information and risk-management practices for the communications technology supply chain set forth in our December 2020 report: GAO, *Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks,* GAO-21-171 (Washington, D.C.: Dec. 15, 2020).

[8]GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, GAO-22-105184 (Washington, D.C.: Mar. 3, 2022).

[9]James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

I appreciate HUD's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Daniel Garcia-Diaz, Managing Director, Financial Markets and Community Investment, at garciadiazd@gao.gov or (202) 512-8678. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 96 open recommendations, as well as those additional recommendations in the high-risk areas for which HUD has a leading role. Thank you for your attention to these matters.

Sincerely yours,

Gene L. Dodaro
Comptroller General
of the United States

Enclosure

cc: Marion McFadden, Principal Deputy Assistant Secretary, Office of Community Planning and Development

Jemine A. Bryon, Deputy Assistant Secretary, Office of Special Needs and Assistance Programs

Jessie Kome, Director, Office of Block Grant Assistance

Ashley L. Sheriff, Acting Deputy Assistant Secretary, Real Estate Assessment Center

Alanna McCargo, President, Ginnie Mae

Dominique Blom, General Deputy Assistant Secretary, Office of Public and Indian Housing

Matthew E. Ammon, Director, Office of Lead Hazard Control and Healthy Homes

Robert Mulderig, Deputy Assistant Secretary, Office of Public Housing Investments
Christopher Webber, Principal Deputy Chief Information Officer, Office of the Chief Information Officer

The Honorable Shalanda Young, Director, Office of Management and Budget

Enclosure -- Priority Open Recommendations to Department of Housing and Urban Development (HUD)

Improving Data Collection on Homelessness

***Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*. GAO-20-433. Washington, D.C.: July 14, 2020.**

Year Recommendations Made: 2020

Recommendation: HUD's Office of Special Needs Assistance Programs should conduct quality assurance checks on the Point-in-Time (PIT) count methodology data it requires Continuums of Care (CoC) to submit and take actions as appropriate to ensure that HUD's standards for conducting valid and reliable PIT counts are met.

Action Needed: HUD agreed with our recommendation. As of March 2023, HUD updated its guidance to CoCs on the PIT count methodology and responded to CoCs' questions on enumerations issues, such as rural counting and counting tents and vehicles. However, HUD has not provided information that it has conducted quality assurance checks on its PIT count methodology data. To fully implement this recommendation, HUD needs to assess the quality of the methodology underlying the information CoCs submit, such as by having CoCs submit sampling plans and extrapolation calculations and reviewing such submissions for soundness and accuracy. Without implementing quality assurance checks for its PIT count methodology data, HUD risks counts that underestimate the number of persons experiencing homelessness and that show fluctuations that do not accurately reflect the changes in the homeless population.

Recommendation: HUD's Office of Special Needs Assistance Programs should assess and enhance the usefulness of its assistance to CoCs' data collection efforts.

Action Needed: HUD agreed with our recommendation. As of March 2023, HUD was developing an outreach strategy to work with CoCs on PIT count methodologies. In 2022, HUD officials told us they were planning to select a random sample of CoCs and provide one-on-one outreach and assistance on PIT count methodology and data collection in 2023 (if the effort does not overburden CoCs as they continue to respond to the pandemic). To fully implement this recommendation, HUD needs to complete this effort. Assessing the assistance HUD provides the CoCs would enable HUD to further improve the quality of information collected.

Director: Alicia Puente Cackley

Contact Information: cackleya@gao.gov, (202) 512-8678

Addressing Challenges in Federal Disaster Recovery Efforts

***Disaster Recovery: Better Information Is Needed on the Progress of Block Grant Funds*.**
GAO-23-105295. Washington, D.C.: December 15, 2022.

Year Recommendation Made: 2023

Recommendation: The HUD Assistant Secretary for Community Planning and Development should, in the event of future Community Development Block Grant Disaster Recovery (CDBG-DR) funding, require recipients to collect and analyze data on critical milestones needed to monitor the timeliness of their housing activities and inform corrective actions, consistent with leading project management practices.

Action Needed: HUD neither agreed nor disagreed with this recommendation. In December 2022, HUD stated it believes that CDBG-DR grantees already collect and analyze data on critical milestones. However, because HUD does not require grantees to collect data on application processing and construction milestones for housing programs, grantees are not able to effectively monitor and manage program timeliness. By requiring grantees to maintain reliable data on critical milestones, HUD could help grantees identify problem areas and assess the need for corrective actions to improve program efficiency.

Director: Jill Naamane
Contact Information: naamanej@gao.gov, (202) 512-8678

> ***Disaster Recovery: Actions Needed to Improve the Federal Approach. GAO-23-104956. Washington, D.C.: November 15, 2022.***

Year Recommendation Made: 2023

Recommendation: The Secretary of Housing and Urban Development should, in consultation with the Recovery Support Function Leadership Group, identify and take steps to better manage fragmentation between its disaster recovery programs and other federal programs, including consideration of the options identified in this report. If HUD determines that it needs authority for actions that it seeks to implement, it should request that authority from Congress.

Action Needed: HUD agreed with this recommendation and indicated it would consider the options in our report as the agency examines ways to streamline disaster assistance across programs. HUD estimated it would complete this review by December 2023. To fully implement this recommendation, HUD needs to identify and take steps to manage fragmentation between its disaster recovery program and other federal programs. Doing so could improve service delivery to disaster survivors and communities and improve the effectiveness of federal recovery efforts.

Director: Christopher Currie
Contact Information: curriec@gao.gov, (404) 679-1875

> ***Disaster Recovery: Additional Actions Needed to Identify and Address Potential Recovery Barriers. GAO-22-104039. Washington, D.C.: December 15, 2021.***

Year Recommendations Made: 2022

Recommendation: The HUD Assistant Secretary for Community Planning and Development should, in coordination with the Federal Emergency Management Agency (FEMA) Administrator and the Small Business Administration, develop, with input from key recovery partners, and implement an interagency plan to help ensure the availability and use of quality information that includes (1) information requirements, (2) data sources and methods, and (3) strategies for overcoming information challenges to support federal agencies involved in disaster recovery in identifying access barriers or disparate outcomes.

Action Needed: HUD neither agreed nor disagreed with this recommendation. In December 2022, HUD officials told us they were building the infrastructure needed to collect and share data with their federal recovery partners. In March 2022, HUD entered into an interagency agreement with FEMA to coordinate data sharing. According to officials, HUD participates in an interagency group to assess and overcome constraints on sharing privacy data across federal agencies that directly serve disaster survivors. HUD, FEMA, and SBA also committed to providing technical assistance to federal agencies involved in disaster recovery to build tools for sharing and using data to support their equity efforts. These efforts may improve HUD's access to information needed to help identify access barriers and disparate outcomes.

However, to address the recommendation and ensure the availability and use of quality information for these purposes, HUD (and FEMA and SBA) will need to develop and implement a documented, interagency plan that specifies the data needed, sources of those data, and methods for obtaining those data. Working together, the federal agencies with large recovery programs will have opportunities to devise workable approaches to solve these challenges and ensure that disaster survivors have equal opportunity to access recovery programs.

Recommendation: The HUD Assistant Secretary for Community Planning and Development should coordinate with the FEMA Administrator and SBA to design and establish routine processes to be used within and across federal disaster recovery programs to address identified access barriers and disparate outcomes on an ongoing basis.

Action Needed: HUD neither agreed nor disagreed with this recommendation. In December 2022, HUD officials told us they introduced a new fair housing and civil rights assessment and a pilot dashboard designed to help officials understand the demographics of disaster survivors who benefit from CDBG-DR funds. HUD officials said they will use the dashboard to conduct equity analyses to help identify disparate outcomes. HUD plans to share its equity analyses with FEMA and SBA, and convene interagency staff and leadership working groups to address issues identified in the analyses. The dashboard and these analyses may be useful for reporting on CDBG-DR's performance and the status of CDBG-DR funded-projects, but the dashboard is not responsive to our recommendation.

To fully implement this recommendation, HUD must provide evidence it has designed and institutionalized routine processes to be used within and across federal recovery programs to address identified access barriers and disparate outcomes on an ongoing basis. Without routine processes, these programs will lack a mechanism to ensure they can address any potential access barriers or disparate outcomes they might identify, particularly if those barriers or disparate outcomes arise from the interaction between or among programs.

Director: Christopher Currie
Contact Information: curriec@gao.gov, (404) 679-1875

Addressing Cybersecurity Challenges

> ***Privacy: Dedicated Leadership Can Improve Programs and Address Challenges.*** **GAO-22-105065. Washington, D.C.: September 22, 2022.**

Year Recommendation Made: 2022

Recommendation: The Secretary of Housing and Urban Development should incorporate privacy into an organization-wide risk-management strategy that includes a determination of risk tolerance.

Action Needed: HUD disagreed with our recommendation. Specifically, HUD stated that privacy risks at the enterprise level are addressed through the agency's Risk Management Council. Although a dedicated risk-management council can be an important tool for managing agency risks, it does not replace the need for a documented risk-management strategy in which the agency explicitly frames its approach to privacy risk. To fully implement this recommendation, HUD needs to develop and implement a risk-management strategy that addresses privacy, including a determination of HUD's risk tolerance. Without such a strategy, HUD will have less assurance that it will manage privacy risks within acceptable thresholds.

Director: Jennifer Franks

Contact Information: franksj@gao.gov, (404) 679-1831
Director: Marisol Cruz Cain
Contact Information: cruzcainm@gao.gov, (202) 512-5017

Improving Real Estate Assessment Center Physical Inspection Process

> **Real Estate Assessment Center: HUD Should Improve Physical Inspection Process and Oversight of Inspectors. GAO-19-254. Washington, D.C.: March 21, 2019.**

Year Recommendation Made: 2019

Recommendation: The Deputy Assistant Secretary for the Real Estate Assessment Center should conduct a comprehensive review of the physical inspection process.

Action Needed: HUD agreed with this recommendation. In February 2023, HUD's Real Estate Assessment Center (REAC) officials told us that they have undertaken several reviews of the physical inspection process, including a comprehensive review of process areas that support inspection activities. They said their analysis indicated that nearly every process supporting REAC's inspection activities require enhancement, and they anticipate publishing the final notice for updated inspection standards in 2023. To implement our recommendation, REAC needs to provide documentation that demonstrates they have conducted a comprehensive review and that the findings of that review informed the design of its new physical inspection program. Without such a review, REAC cannot determine if it is meeting its goal of producing inspections that are reliable, replicable, and reasonable.

Director: Jill Naamane

Contact Information: naamanej@gao.gov, (202) 512-8678

Strengthening Processes to Address Lead Paint Hazards

> **Lead Paint in Housing: HUD Should Strengthen Grantee Processes, Compliance Monitoring, and Performance Assessment. GAO-18-394. Washington, D.C.: June 19, 2018.**

Year Recommendations Made: 2018

Recommendation: The Director of HUD's Office of Lead Hazard Control and Healthy Homes and the Assistant Secretary for the Office of Public and Indian Housing (PIH) should collaborate to establish a plan to mitigate and address risks within HUD's lead paint compliance monitoring processes.

Action Needed: HUD generally agreed with this recommendation. HUD has been working to establish a risk-based monitoring structure through which agencies would identify particular public housing agencies with lead paint hazard risks. In October 2022, HUD launched an online Lead-Based Paint Tracker, which is intended to track and monitor the compliance of public housing agencies with the Lead Safe Housing Rule. In January 2023, HUD issued a broad Comprehensive Compliance Monitoring Plan to help HUD prioritize its overall oversight of public housing agencies' compliance with several HUD requirements and regulations. HUD officials told us they plan to use the Lead-Based Paint Tracker to help prioritize HUD oversight of public housing agencies by comparing those identified by the tracker as potentially not in compliance with lead paint regulations to the public housing agencies that were identified for a comprehensive compliance monitoring review.

To fully implement the recommendation, HUD needs to provide documentation that it is leveraging the information in the Lead-Based Paint Tracker to address lead paint hazard risks in its broader compliance monitoring processes. Doing so could further strengthen HUD's oversight and keep public housing agencies accountable for ensuring that housing units are lead-safe.

Recommendation: The Director of HUD's Office of Lead Hazard Control and Healthy Homes and the Assistant Secretary for PIH should collaborate to develop and document procedures to ensure that HUD staff take consistent and timely steps to address issues of public housing agencies' noncompliance with lead paint regulations.

Action Needed: HUD generally agreed with this recommendation. As of December 2022, HUD officials told us its policy on administrative actions for noncompliance in the Public Housing and Housing Choice Vouchers programs was being updated to include programmatic changes to its physical inspection standards. In addition, HUD developed a new policy on "remedies for public housing agencies for poor performing owners in the Housing Choice Voucher program," which is pending internal review. To fully implement this recommendation, HUD needs to finalize procedures that would ensure HUD staff address public housing agencies' noncompliance with lead paint regulations. By adopting procedures that clearly describe when compliance efforts for lead paint hazards are no longer sufficient and enforcement decisions are needed, HUD could better keep public housing agencies accountable in a consistent and timely manner.

Director: Jill Naamane

Contact Information: naamanej@gao.gov, (202) 512-8678

Improving IT Management

> ***Information Technology: HUD Can Take Additional Actions to Improve Its Governance.***
> **GAO-15-56. Washington, D.C.: December 10, 2014.**

Year Recommendation Made: 2015

Recommendation: To establish an enterprise-wide view of cost savings and operational efficiencies generated by investments and governance processes, the Secretary of Housing and Urban Development should direct the Deputy Secretary and Chief Information Officer to place a higher priority on identifying governance-related cost savings and efficiencies and establish and institutionalize a process for identifying and tracking comprehensive, high-quality data on savings and efficiencies resulting from IT investments and the IT governance process.

Action Needed: HUD agreed with this recommendation. In November 2022, HUD reported that its governance boards had begun considering whether IT investments were designed to deliver operational value to programs or the agency as a whole. Adding such criteria to the IT selection process provides a starting point for considering the savings or efficiencies investments may generate. However, as of January 2023, HUD had not yet begun tracking expected or actual cost savings or efficiencies for individual investments or from its IT governance processes. To fully implement this recommendation, HUD needs to provide evidence that it established guidance supporting a repeatable process for tracking enterprise-wide IT-related cost-savings and operational efficiencies, including those related to governance decisions. Doing so would improve HUD's ability to monitor the outcomes of its IT governance activities.

High-Risk Area: Improving the Management of IT Acquisitions and Operations

Director: Kevin Walsh

Contact Information: walshk@gao.gov, (202) 512-6151