



OFFICE *of*
INSPECTOR GENERAL
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UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

The U.S. Department of Housing and Urban Development's Use and Oversight of Telework and Remote Work

2024-OE-0004

October 4, 2024

Date: October 4, 2024

To: Lori Michalski
Chief Human Capital Officer, Office of the Chief Human Capital Officer, A

From: John Garceau
Acting Assistant Inspector General for Evaluation, Office of Inspector General, G

Subject: Final Report – The U.S. Department of Housing and Urban Development’s Use and Oversight of Telework and Remote Work

Please see the attached final report on the evaluation of the U.S. Department of Housing and Urban Development’s (HUD) use and oversight of telework and remote work. It contains three findings and one recommendation. Our evaluation objectives were to assess

1. HUD employees’ use of telework and remote work programs.
2. HUD’s administration of locality payments to its teleworkers and remote workers.
3. HUD’s support and training of supervisors overseeing employee participation in telework and remote work programs.

In response to our draft report, the Office of the Chief Human Capital Officer (OCHCO) provided technical comments, which we incorporated into the final report as appropriate. We offered OCHCO the opportunity to provide formal comments. These formal comments, along with our response to those comments, are included as appendix A in this report. We have received and agree with the proposed management decision for the recommendation. Therefore, the status of this recommendation is “resolved-open.”

I greatly appreciate the assistance you and your staff provided throughout the evaluation. The report will be posted to our website within 3 days. Please contact Chris Backley, Director of the Program Evaluation Division, at 202-731-9804 or cbackley@hudoig.gov with any questions.

cc

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Executive Summary

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S USE AND OVERSIGHT OF TELEWORK AND REMOTE WORK | 2024-OE- 0004

Why We Did This Evaluation

We conducted this evaluation to assess the U.S. Department of Housing and Urban Development's (HUD) use of telework and remote work programs, how it administers locality pay to employees participating in each of these programs, and how it supports and trains supervisors overseeing employees who telework or work remotely. We initiated this work in response to an August 28, 2023, letter from Senator Joni Ernst, which requested that Inspectors General from 24 Federal agencies review agencies' oversight and management of their remote workers and teleworkers.

Results of Evaluation

As of January 2024, 85 percent of HUD employees had approved telework agreements, and 9 percent had approved remote work agreements. HUD estimated that 31 percent of remote employees were remote as a reasonable accommodation. Most of HUD's remote workers served in a limited number of occupations.

We evaluated the Office of the Chief Human Capital Officer's (OCHCO) controls over the quality of data related to remote work and telework, including employees' assignments to locality pay areas. OCHCO implemented controls over telework and remote work agreements and locality pay for remote workers. OCHCO established centralized oversight of the Flexiplace program and conducted periodic reviews of all Flexiplace agreements to verify that agreements complied with policy. Before our evaluation, OCHCO reviewed the locality pay of 700 remote workers and identified 6 with incorrect locality pay.

Additional controls over Flexiplace telework agreements would reduce the risk of incorrect locality payments to teleworkers and of out-of-date telework agreements. Locality payments for teleworkers are not impacted by their telework location, so OCHCO chose not to specifically review locality payments to teleworkers or telework agreement location data. We identified 2 percent of teleworkers with discrepancies between their official duty stations and Flexiplace agreements, but these employees had a low risk of receiving incorrect locality payments. Discrepancies may also include telework agreements that were out of date or incorrect official duty stations but correct locality payments. In response to our evaluation, OCHCO modified its review process for remote work agreements to track whether employees approved for remote work as a reasonable accommodation submitted remote work agreements.

In addition, 9 percent of teleworkers (626 employees) had official duty stations that matched the self-reported duty stations listed on their telework agreements but had telework worksites that were more than HUD's defined commuting distance of a 50-mile radius from their agency worksite. The U.S. Office of Personnel Management's policy allows teleworkers to live outside an agency's defined official station radius. Given that HUD's data indicated that 9 percent of HUD employees had commutes longer than 50 miles, some of these 626 HUD employees may have received incorrect locality pay or had official duty stations or telework worksites that needed to be corrected.



HUD employees' supervisors are typically responsible for enforcing the telework and remote work policy and the terms of their agreements and for ensuring that employees reflected their telework or remote schedules on their timesheets. OCHCO offered a variety of training courses designed to support supervisors in overseeing telework and remote work programs. The training included 27 courses for supervisors related to telework and remote work and 30 courses addressing managing employee performance, including employees who participate in telework or remote work programs.

Recommendation

We recommend that the Chief Human Capital Officer implement a process to identify teleworkers most at risk of receiving incorrect locality payments, verify that their official duty stations are correct and they are reporting to their official duty stations as required, and if necessary, correct their locality payments.

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Introduction

OBJECTIVES

Our evaluation objectives were to assess

1. The U.S. Department of Housing and Urban Development (HUD) employees' use of telework and remote work programs.
2. HUD's administration of locality payments to its teleworkers and remote workers.
3. HUD's support and training of supervisors overseeing employee participation in telework and remote work programs.

BACKGROUND

Telework and Remote Work Arrangements

The Telework Enhancement Act of 2010 required Federal agencies to establish telework programs¹ for eligible employees that would allow employees to work from an alternative worksite while ensuring that employees' performance and agency operations would not be negatively affected by teleworking. The U.S. Office of Personnel Management (OPM) designated two types of arrangements in which employees may work from an alternative worksite: telework, in which employees work from both an agency worksite and a telework worksite, and remote work, in which employees work from only a remote worksite. For a glossary of terms used in this report, see appendix C.

In 2022, HUD established an expanded telework program and new remote work program, collectively called the Flexiplace program. According to HUD's policy, a regular telework arrangement is a voluntary arrangement in which employees work from both agency and telework worksites on a regular and recurring basis each pay period (figure 1). A situational telework arrangement means that employees normally work from their agency worksite on all days but may request to work from a telework worksite when the need arises. Situational teleworkers must get management approval for each instance of telework. HUD's policy defined a remote work arrangement as one in which an employee works from a remote worksite without reporting to an agency worksite at least twice per pay period. Teleworkers and remote workers must have written Flexiplace agreements.

Figure 1. Comparison of regular telework, situational telework, and remote work arrangements as defined under HUD's Flexiplace program

Location where employee works	 Regular teleworker	 Situational teleworker	 Remote worker
Agency worksite	2+ days per pay period	Normally all days	≤1 day per pay period
Alternative worksite	1+ days per pay period	On case-by-case basis	All days or all but 1 day

¹ The Telework Enhancement Act of 2010, codified as 5 U.S.C. (United States Code) chapter 65, defined telework as “a work flexibility arrangement under which an employee performs the duties and responsibilities of such employee’s position, and other authorized activities, from an approved worksite other than the location from which the employee would otherwise work.”

HUD's Telework and Remote Work Eligibility Criteria

According to HUD's Flexiplace policy, HUD designates all positions as either eligible or ineligible for telework or remote work, typically during the position development process. Positions eligible for a Flexiplace agreement are those that involve tasks, duties, and work activities that are portable and do not depend on the employee being at the traditional worksite. HUD also considers whether positions are developmental or trainee positions, as telework or remote work may not be suitable for these positions.² Positions ineligible for a Flexiplace agreement may include positions that require employees to have daily face-to-face contact with supervisors, colleagues, clients, or the public to perform the job effectively. They may also include positions that require routine access to classified or sensitive information that cannot be secured or transported to a remote location.

In addition, when determining whether a position is eligible for remote work, HUD considers the frequency of travel and any budgetary implications of changes in locality pay areas, transit and travel costs, and real estate and facility savings. Lastly, HUD considers whether the remote designation is applied equitably across similar positions in similar circumstances.

Employees in positions eligible for telework or remote work must apply to participate in the Flexiplace program. HUD's policy lays out the criteria under which a supervisor can approve or deny employees' telework or remote work applications. When determining individuals' eligibility, the policy directs supervisors to consider factors, such as an official record of misconduct or poor performance, a history of unexcused absences, or a previously demonstrated inability to work independently.³ Additionally, supervisors may deny telework or remote work requests if they create hardships for the office due to insufficient coverage or budget constraints or if the employee does not have access to secure, reliable internet.

Locality Payments to Teleworkers and Remote Workers

According to Federal regulation, agencies must determine locality payments based on employees' telework or remote work schedules.⁴ A locality payment is additional payment intended to reduce the discrepancy in certain geographic areas between Federal workers' General Schedule (GS) pay rates and non-Federal workers doing the same level of work. The regulation and HUD policy both state that teleworkers scheduled to report to their agency worksites at least twice per biweekly pay period on a regular and recurring schedule must receive locality payments based on the locations of their agency worksites. Remote workers, who are regularly scheduled to report to agency worksites less than twice per pay period, must receive locality payments based on the locations of their remote worksites. For example, an employee whose remote worksite is their home residence would get paid based on the locality pay area of their home address.

² Except for training-driven positions, HUD cannot exclude positions from telework eligibility based on occupation, series, or grade under the Flexiplace policy.

³ The Telework Enhancement Act of 2010 prohibited employees from teleworking if they had been officially disciplined for either (a) being absent without permission for more than 5 days in a calendar year or (b) viewing, downloading, or exchanging pornography on a Federal Government computer or while performing official Federal Government duties.

⁴ 5 CFR (Code of Federal Regulations) 531.605(d)

Findings

HUD EMPLOYEES' USE OF TELEWORK AND REMOTE WORK PROGRAMS

Eighty-five percent of HUD employees had approved regular telework agreements, and 9 percent had remote work agreements. For a breakdown of HUD employees' use of the Flexiplace program, see figure 2.

Figure 2. Number of approved Flexiplace agreements for full-time, permanent, GS-level employees

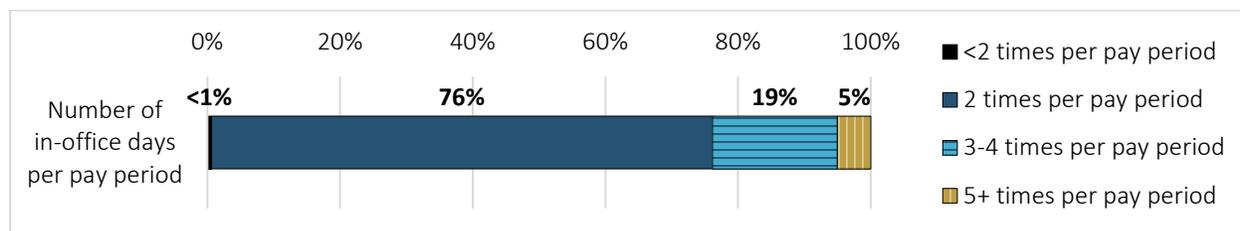
Flexiplace agreement type	Number of employees	Percentage of all employees
Regular telework agreement	6,856	85%
Remote work agreement	747	9%
Situational telework agreement	107	1%
No Flexiplace agreement	281	4%
Mobile worker*	106	1%
All full-time, permanent, GS-level employees	8,097	100%

Source: Data provided by HUD as of January 2024

* OPM and HUD's Flexiplace Handbook define mobile work as work requiring routine and regular travel to customer or other worksites as opposed to a single authorized alternative worksite.

Ninety-five percent of HUD employees with regular telework agreements scheduled between 2 and 4 in-office days per pay period (figure 3). For regular teleworkers, HUD required nonsupervisory employees to come into the office at least twice per pay period and supervisory employees to come into the office at least 4 days per pay period.

Figure 3. Percentage of full-time, permanent, GS-level employees with regular telework agreements by number of days per pay period they are scheduled to work in the office



Source: Data provided by HUD as of January 2024

HUD approved employees to work remotely in one of two circumstances: (1) if employees requested and were approved for remote work as reasonable accommodations or (2) if employees in positions already approved as remote eligible requested to change to remote work or were hired for remote work. As discussed previously, HUD management determined whether positions were eligible for remote work

based on the positions' duties, the budgetary implications of remote work, and equity considerations. HUD estimated that 31 percent of remote employees were remote due to reasonable accommodations.⁵ The remainder were in positions eligible for remote work.

HUD approved remote work for select occupations. When analyzing data on the occupations held by employees with remote work agreements, we noted that 63 percent of these employees held a few select positions. These data included employees who were approved for remote work on the basis of either their position or a reasonable accommodation.

THE ACCURACY OF HUD'S LOCALITY PAYMENTS TO ITS TELEWORKERS AND REMOTE WORKERS

The Office of the Chief Human Capital Officer (OCHCO) implemented multiple controls over the accuracy of telework and remote work data but did not review locality payments to teleworkers. OCHCO established centralized oversight of the Flexiplace program, which resulted in 99 percent of Flexiplace agreements complying with HUD's policy. HUD's locality payments to remote workers were also 99 percent accurate, and OCHCO implemented an additional control over locality payments to remote workers after identifying errors in six employees' locality payments. However, we identified up to 11 percent of teleworkers with potential discrepancies between their official duty stations and Flexiplace agreements. While potential discrepancies do not necessarily mean that employees received incorrect locality pay, additional controls over Flexiplace agreements would reduce the possibility of incorrect locality payments to teleworkers and inaccurate Flexiplace agreements.

OCHCO Established Multiple Controls Over Flexiplace Agreements To Ensure Completeness and Compliance With Policy

OCHCO established centralized oversight of the Flexiplace program and conducted periodic reviews of all Flexiplace agreements to verify that agreements complied with policy. (See appendix B for more information on data sources.) These controls resulted in 99 percent of Flexiplace agreements having schedules that aligned with the type of telework and remote work arrangements employees were approved to work.

OCHCO Established Centralized Oversight of the Flexiplace Program

In 2022, OCHCO established an application process for Flexiplace arrangements to allow centralized oversight of the Flexiplace program (figure 4). Any employee interested in participating in the telework or remote work programs must submit a Flexiplace application. In the application, employees must, among other information, include the following:

- Flexiplace agreement type: regular telework, situational telework, remote work within a 50-mile radius of a HUD office, or remote work more than 50 miles from any HUD office.⁶
- Alternative location from which they will telework or work remotely.

⁵ HUD's reasonable accommodation tracking system does not provide summary statistics on the number of employees whose accommodation is remote work. HUD estimated this number by taking the number of remote workers and subtracting the number in positions approved for remote work.

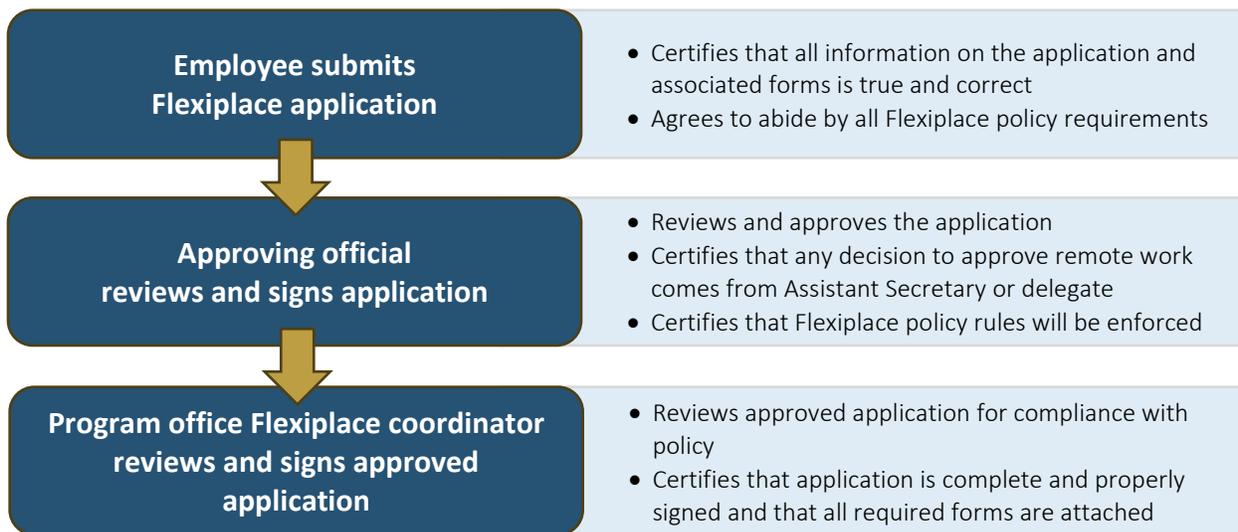
⁶ The Flexiplace agreement also lists continuity of operations-only telework as an option, but as of September 2024, there are no HUD employees with this type of agreement.

- Proposed schedule of which days in a pay period they plan to work at their alternative worksite and agency worksite. For example, employees applying for regular telework may indicate that they plan to report to their agency worksite on Tuesdays and work from their alternative worksite the other days of the week.
- Certification that they have completed OPM’s Telework Fundamentals training.

To ensure that Flexiplace applications are complete and properly filled out, the application process includes multiple layers of review and approval for applications. Each Flexiplace application is signed by the employee, their approving official, and their Flexiplace program coordinator. Employees’ immediate supervisors usually serve as the approving officials and, as such, are responsible for determining whether employees are eligible to participate in the Flexiplace program. Approving officials are also responsible for ensuring that employees’ official duty stations are changed when remote work agreements are approved.

Once approving officials sign the Flexiplace applications, the signed agreements are sent to the Flexiplace coordinators for the employees’ program offices. The Flexiplace coordinators are designated officials in each program office responsible for reviewing Flexiplace applications for completeness and notifying employees and supervisors of any deficiencies.

Figure 41. Review and approval process for new telework and remote work Flexiplace applications



OCHCO retains approved applications in a central repository, which allows OCHCO to implement additional controls over the accuracy and completeness of all Flexiplace applications. For example, every other pay period, OCHCO confirms whether employees with newly approved remote work agreements were authorized for remote work by the Assistant Secretary or designee for their program offices or as reasonable accommodations. Employees who were not authorized for remote work are directed to submit new Flexiplace applications with nonremote schedules.

OCHCO Established Controls Over Flexiplace Schedules’ Compliance With Policy

OCHCO’s centralized oversight of the Flexiplace program resulted in 99 percent of Flexiplace agreements having schedules that aligned with the type of telework and remote work arrangements that employees

were approved to work (figure 5). When employees apply for Flexiplace arrangements, they establish schedules of which days per pay period they will work in the office and which days they will telework or work remotely. To ensure that these schedules matched the type of Flexiplace agreements (that is, the type of arrangements employees were approved to work), OCHCO reviewed all Flexiplace agreements and provided lists of noncompliant agreements to program offices for corrections in June and December 2023 and in January 2024.⁷ OCHCO directed program offices to correct agreements that did not comply with HUD’s policies.

OCHCO’s controls over Flexiplace agreements were effective in identifying agreements with noncompliant schedules. We identified 66 of 7,710 agreements (1 percent) with schedules that differed from the agreement types, were missing, or did not match full-time work. The largest group of discrepancies included 41 employees with regular telework agreements who scheduled fewer than the 2 in-office days per pay period that HUD requires for regular teleworkers.⁸ The second largest group included 14 employees with situational telework agreements who had regular telework days scheduled. This finding did not match HUD’s policy, which directs employees with situational telework agreements to submit schedules showing that their default schedule is to work in the office on all days.

In addition, nine employees had approved Flexiplace agreements with no schedules listed or which listed schedules with fewer than 8 working days per pay period despite those employees being in full-time positions. Lastly, two employees with remote work agreements scheduled 2 or more in-office days per pay period. HUD’s job aid for completing the Flexiplace application states that employees with remote work agreements should submit schedules showing that they work remotely on all days.⁹

Figure 5. Number of full-time, permanent, GS-level HUD employees with Flexiplace agreements whose schedules matched or differed from their agreement type¹⁰

Data agreement between employee’s schedule and Flexiplace agreement type	Number of employees	Percentage of employees
Employee’s schedule matched Flexiplace agreement type	7,644	99%
Employee’s schedule differed from Flexiplace agreement type	66	1%
Regular telework agreement with <2 in-office days	41	<1%
Situational telework agreement with telework days	14	<1%
Flexiplace agreement with no schedule submitted or schedule that does not match full-time work	9	<1%
Remote work agreement with ≥2 in-office days	2	<1%
Total employees with Flexiplace agreements	7,710	100%

Source: Data provided by HUD as of January 2024

⁷ OCHCO also provided lists of noncompliant agreements to program offices in February and May 2024, but this was outside the scope of our evaluation.

⁸ HUD’s policy categorizes arrangements with 0 or 1 day in the office per pay period as remote.

⁹ The job aid on completing the Flexiplace application does not mention remote workers who come into the office 1 day per pay period. Presumably, those workers should submit schedules with 1 in-office day.

¹⁰ The analysis excluded mobile workers.

OCHCO Established an Additional Control Over the Accuracy of Locality Payments for Remote Employees After Identifying Six Remote Employees Who Received Incorrect Locality Payments

In late 2023, OCHCO established a new control to ensure the accuracy of locality payments for remote workers. Shortly before we started our work, OCHCO began a review of locality payments made to 700 remote workers. Of those 700 remote workers, OCHCO identified 6 employees who had received incorrect locality payments. OCHCO corrected those employees' official duty stations and locality pay area assignments and adjusted their locality payments back to the date on which their official duty stations should have changed. It also identified 5 employees with out-of-date Flexiplace agreements and 80 employees assigned to incorrect official duty stations but correct locality pay areas. Upon completion of the review, OCHCO committed to including a review of all newly approved remote employees' locality pay in future iterations of OCHCO's quarterly reviews of human capital data accuracy. We conducted a similar analysis and did not identify additional remote workers who were assigned to incorrect locality pay areas.

OCHCO Did Not Review Locality Payments for Teleworkers

Additional controls over Flexiplace telework agreements would reduce the possibility of incorrect locality payments to teleworkers and inaccurate Flexiplace agreements. Locality payments for teleworkers are not impacted by their telework location, so OCHCO chose not to specifically review locality payments to teleworkers or telework agreement location data. We identified 2 percent of teleworkers with discrepancies between their official duty stations and Flexiplace agreements or with official duty stations in cities with no HUD office (figure 6). Overall, these employees had a low risk of receiving incorrect locality payments but may need to update their Flexiplace agreements. We identified an additional 9 percent of teleworkers whose official and self-reported duty stations matched but were more than 50 miles from their telework worksites. These employees—especially those with substantially more than a 50-mile distance who are scheduled to report to the office on nonconsecutive days—may be at risk of receiving incorrect locality payments.¹¹ Federal law and regulation require agencies to determine employees' official duty stations and to pay them based on the location of said duty stations, so HUD must correct any inaccuracies in official duty stations or locality payments.

We compared employees' official duty stations, telework worksites, and self-reported duty stations and calculated the distances between locations to identify potential errors in locality payments or inaccurate Flexiplace agreements. (See appendix B for methodology.) Flexiplace agreements serve as HUD's official record of employees' telework worksites. Accordingly, employees must submit new Flexiplace agreements if their telework locations change. Since teleworkers' locality payments are based on their official duty stations, which do not change because of teleworking, telework worksites have no impact on locality payments. HUD's Flexiplace agreements also include a field for employees to provide their "current official duty station address." (We refer to this here as the self-reported duty station.) Self-reported duty stations are not official records of employees' duty stations, but both employees and their supervisors certified that Flexiplace applications were correct. Accordingly, self-reported duty stations that do not match official duty stations provide an opportunity to identify potential errors, such as incorrect official duty station data or Flexiplace agreements that are out of date. However, employees do

¹¹ Determining whether potential discrepancies were errors would have required contacting each employee and their supervisor to determine where employees are approved to work. This was outside the scope of our evaluation.

not need to submit new Flexiplace agreements if their self-reported duty stations do not match their current official duty stations as long as the other information on the agreements is correct.

Figure 6. Number of full-time, permanent, GS-level HUD employees with regular or situational telework agreements by type of potential discrepancies between official duty stations and telework agreements

Agreement between official duty station and location data in regular or situational telework agreements	Number of employees	Percentage of teleworkers
Official duty station matched self-reported duty station and ≤50 miles between telework worksite and official duty station	6,163	89%
Potential discrepancy between official duty station and self-reported duty station	764	11%
Official duty station differed from self-reported duty station, was in a city with no HUD office, or both	139	2%
Official duty station matched self-reported duty station but >50 miles between telework worksite and official duty station	626	9%
Total included in analysis	6,928	100%
Total excluded from analysis due to missing, invalid, or foreign address data	35	-
Total employees with regular or situational telework agreements	6,963	-

Source: Data provided by HUD as of January 2024

Two Percent of Teleworkers Had Official Duty Stations That Differed From Their Self-Reported Duty Stations or Were in Cities With No HUD Office, but Most Had a Low Risk of Incorrect Locality Pay

There were 139 teleworkers (2 percent) whose official duty stations differed from their self-reported duty stations, had official duty stations in cities with no HUD office, or both (figure 6). These differences could be caused by incorrect self-reported duty stations, official duty stations, or both. In addition, these employees may have incorrect remote statuses, mobile work statuses, telework worksites, or a combination. Overall, we determined that these employees had a low risk of having incorrect locality pay, but two employees needed to submit remote work agreements, and 104 employees may have needed to submit new Flexiplace agreements.

We examined teleworking employees' official duty stations and Flexiplace agreements and calculated the approximate distances between employees' telework worksites, their official duty stations, and their self-reported duty stations.¹² We provided our analysis to OCHCO staff members and requested that they confirm the locality pay of the subset of employees we identified as most likely to have incorrect locality pay. These 10 employees had official duty stations and locality pay codes that matched their telework worksites instead of their self-reported duty stations. OCHCO confirmed that these 10 employees had received correct locality payments. Discrepancies among these employees were due to incorrect self-reported duty stations (which do not need to be corrected), Flexiplace agreements that needed to be updated, or mobile work statuses that needed to be updated.

¹² We calculated distances based on city and State for official duty station and telework worksite and the full address of the self-reported duty station. See appendix B for more information.

Notably, 2 of the 10 employees we identified as high risk had been approved for remote work as reasonable accommodations. In response to our evaluation, OCHCO directed these employees' supervisors to have the employees submit remote work agreements. In addition, OCHCO modified its review process for remote work agreements to track whether employees approved for remote work as reasonable accommodations submitted remote work agreements.

Of the remaining 129 teleworkers whose official duty stations differed from their self-reported duty stations or were in cities with no HUD office, 104 (81 percent) likely needed to update their Flexiplace agreements or have their mobile work status updated.¹³

- Seventeen employees had official duty stations in cities where HUD has no offices (7 employees), had official duty stations that matched their telework worksites instead of their self-reported duty stations¹⁴ (1 employee), or both (9 employees). These employees were likely approved for remote work or mobile work with a remote duty station. They likely received correct locality payments but needed to submit remote work agreements or have their mobile work statuses updated.
- Seventy-one employees had less than or equal to 50 miles between their telework worksites and self-reported duty stations but more than 50 miles between their telework worksites and official duty stations. These employees' official duty stations likely changed (that is, they relocated). This means that they likely received correct locality payments but needed to submit new telework agreements.
- Sixteen employees had more than 50 miles between their telework worksites and both their self-reported and official duty stations, in addition to their self-reported duty stations differing from their official duty stations. It was unclear whether these employees received correct locality payments, and they may need to submit new Flexiplace agreements.

The remaining 25 employees likely had self-reported duty stations that were incorrect or out of date but did not need to update their Flexiplace agreements.

- Thirteen employees had telework worksites within 50 miles of their official duty stations but had self-reported duty stations more than 50 miles away from their telework worksites. These employees likely submitted telework agreements in advance of relocations, with their old duty stations listed as their self-reported duty stations (since those were their "current official duty station address[es]" when they submitted the agreements). Since these employees' telework worksites and official duty stations were within the same locality pay areas, these employees likely received correct locality payments.

¹³ We provided a list of these employees to OCHCO and requested its feedback on our analysis. OCHCO responded that employees do not always update Flexiplace agreements immediately if their position changes, so that there may be a gap between human capital data (official duty station and locality pay code) and Flexiplace agreements. OCHCO stated that HUD will continue to emphasize to supervisors the importance of verifying that their employees are reporting to the correct duty station as scheduled and are updating their Flexiplace agreements in a timely manner.

¹⁴ This employee differs from the 10 discussed above because their telework worksite was in the same locality code as their official duty station.

- Twelve employees had official duty stations that differed from both telework worksites and self-reported duty stations, with all locations within 50 miles of each other. Since all locations were in the same locality pay areas, these employees received correct locality payments.

Nine Percent of Teleworkers Had Official and Self-Reported Duty Stations That Matched but Were More Than 50 miles From Their Telework Worksites

Employees with telework worksites more than 50 miles from their official duty stations had a potential for receiving incorrect locality payments, especially those with substantially more than a 50-mile distance who were scheduled to report to the office on nonconsecutive days. According to OPM, Federal teleworkers are allowed to live outside an agency-defined radius from their official duty stations as long as they report to their official duty stations at least twice per pay period. HUD had 626 employees (9 percent of teleworkers) whose official duty stations and self-reported duty stations matched but were more than the HUD-defined commuting distance of 50 miles from their telework worksites (figure 7). Thirty of these employees had more than 1,000 miles between their telework worksites and official duty stations.¹⁵ Given that HUD’s data indicated that 9 percent of HUD employees had commutes longer than 50 miles, some of these 626 HUD employees may have had incorrect official duty stations, telework worksites, or both. Employees with incorrect official duty stations could have received incorrect locality pay. They may also need their official duty stations corrected or their Flexiplace agreements updated.

Figure 7. Number of full-time, permanent, GS-level HUD employees with regular or situational telework agreements whose official and self-reported duty stations matched but were more than 50 miles from their telework worksites.

Distance between official duty station and telework worksite	Number of employees	Percentage of teleworkers
0-50 miles	6,163	91%
51-100 miles	327	5%
101-200 miles	143	2%
>200 miles	156	2%
Total >50 miles	626	9%
Total all teleworkers	6,798	100%

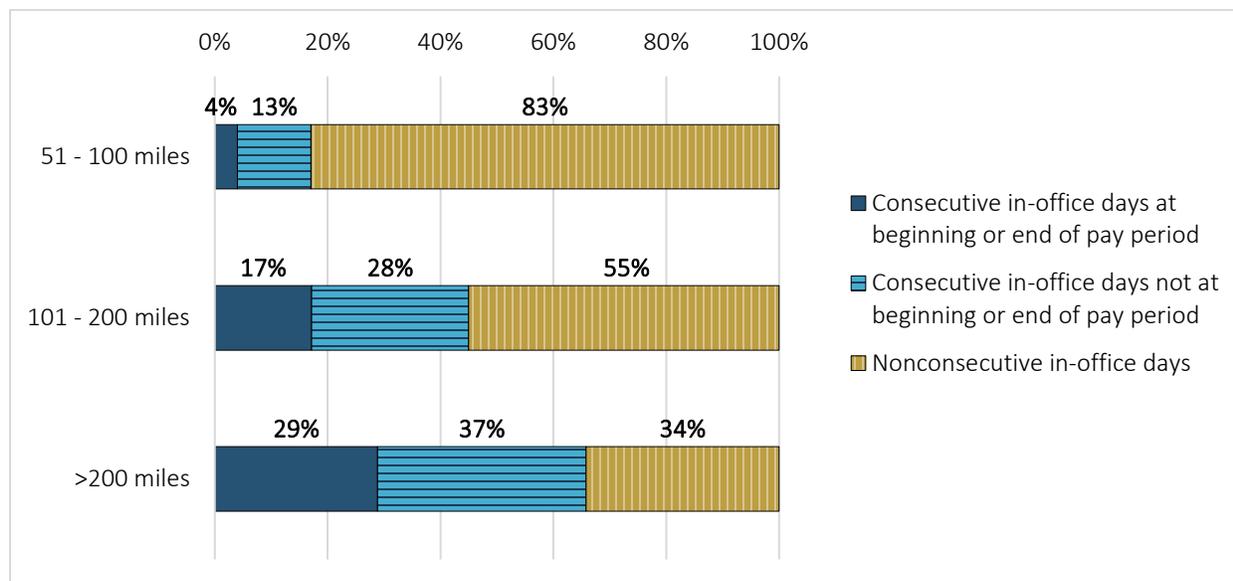
Sources: Data provided by HUD as of January 2024.

We examined the schedules teleworkers set on their approved Flexiplace agreements to assess whether employees with long commutes between their telework worksites and official duty stations had schedules with back-to-back in-office days, indicating the possibility of periodic instead of daily commutes (figure 8). We also looked at whether those consecutive days were at the beginning or end of the pay period, which could allow employees to commute in on the last 2 days of one pay period and the first 2 days of the next pay period, reducing the frequency of periodic long-distance commutes. While the percentage of employees who scheduled consecutive in-office days increased with longer distances, 55 percent of employees with 101 to 200 miles between their telework worksites and official duty stations and 34 percent of employees with more than 200 miles had their in-office days scheduled nonconsecutively. For example, five of these employees had Flexiplace agreements indicating that they commuted more than 2,000 miles every week from one side of the United States to the other or from the mainland United

¹⁵ One additional employee had more than 1,000 miles between their telework worksite and official duty station but did not provide a self-reported duty station on their Flexiplace agreement.

States to Hawaii. We determined that employees with substantially more than 50 miles between their official duty stations and telework worksites who were scheduled to report to the office on nonconsecutive days had the highest potential for incorrect locality payments, official duty stations, or telework worksites.

Figure 8. Schedule type for employees whose official duty stations matched their self-reported duty stations but were more than 50 miles from their telework worksites¹⁶



Source: Data provided by HUD as of January 2024

Recommendation

1. We recommend that the Chief Human Capital Officer implement a process to identify teleworkers most at risk of receiving incorrect locality payments, verify that their official duty stations are correct and they are reporting to their official duty stations as required, and if necessary, correct their locality payments.

HUD’S SUPPORT AND TRAINING OF SUPERVISORS OVERSEEING TELEWORK AND REMOTE WORK PROGRAMS

According to HUD’s Flexiplace and performance management policies, supervisors are responsible for approving and enforcing Flexiplace agreements and managing employee performance and conduct using consistent standards for both in-office and teleworking or remote workers. To support supervisors, between April 25, 2022, and January 13, 2024, OCHCO offered 57 training courses related to overseeing teleworkers and remote workers and managing employee performance and conduct. HUD also encouraged supervisors to seek support from OCHCO’s Employee Labor Relations Division when facing challenges related to overseeing teleworkers and remote workers. HUD’s overall prioritization and

¹⁶ This analysis excluded 14 employees who had situational telework agreements, whose schedule was missing, or who did not meet the requirements of full-time telework.

oversight of its telework and remote work programs earned it recognition from the President's Management Council as a best practice.

Supervisors Are Responsible for Ensuring Compliance With the Flexiplace Agreement

The approving officials for employees' Flexiplace agreements are typically the employees' immediate supervisors. They are responsible for enforcing the terms of the Flexiplace policy and agreements and—for bargaining unit employees—the terms of applicable collective bargaining agreements and supplements. Supervisors are also responsible for monitoring and validating teleworkers' and remote workers' time submissions during each pay period to ensure that they reflect the employees' participation in the Flexiplace program. OCHCO includes timesheet data in its annual reports to OPM on telework and remote work.

According to HUD's policy, supervisors must manage the performance of teleworkers and remote workers the same as nonteleworkers. To support supervisors' performance management, OCHCO's Employee Labor Relations Division encouraged managers to track the volume of work assigned to employees, the quality of employees' deliverables, and whether employees were missing deadlines or meetings. The Division also evaluated the processes managers used to assess performance to help improve employee accountability. If employees did not comply with their Flexiplace applications, the Division recommended that supervisors start a progressive disciplinary actions process.

OCHCO Offered a Variety of Training Courses To Help Supervisors Oversee the Flexiplace Program

To support supervisors, between April 25, 2022, and January 13, 2024, OCHCO offered 57 training courses related to overseeing teleworkers and remote workers and managing employee performance and conduct. OCHCO maintained Flexiplace policy training materials on HUD's internal website for employees, HUD@Work. OCHCO also responded to specific training requests and revamped the new-supervisor training program. An OCHCO official described the goals of its remote and telework training program as providing supervisors the tools and skills to lead people in remote and hybrid environments, including training on soft skills relevant to managing staff, equal employment opportunity issues, using technology to engage teleworkers and remote workers, and how to manage performance when employees telework and work remotely.

OCHCO Offered 27 Training Courses to Supervisors Related to Overseeing Teleworkers and Remote Workers

OCHCO provided 27 training courses to diverse groups of supervisors related to overseeing teleworkers and remote workers. OCHCO offered courses—both online and in person—with varying frequency and covering a wide range of relevant topics. (See appendix D for information on frequency and delivery method.) Of the 27 training courses, 6 were about the HUD Flexiplace program, covering topics such as telework compared to remote work, eligibility, the application and approval process, budgetary impacts, the policy rollout schedule, timesheet reporting, meaningful in-person work, and Flexiplace challenges. The remaining courses covered themes including leadership and management (15 courses), team development and collaboration (5 courses), communication and performance (2 courses), personal and professional development (5 courses), remote work and productivity (2 courses), and telework compliance (1 course).

OCHCO Offered 30 Training Courses to Supervisors on Managing Performance

OCHCO provided 30 training courses to diverse groups of supervisors on managing the performance and conduct of employees regardless of telework and remote work status. As with the training courses on supervising the Flexiplace program, OCHCO offered courses—both online and in person—with varying frequency and covering a wide range of relevant topics. (See appendix D for information on frequency and delivery method.) Of the 30 courses, 21 focused on performance management. Other subjects covered employee relations and labor relations issues (one course), basic tenets of employee relations and managing performance and conduct (four courses), supervisory skills (two courses), an overview of the Employee Labor Relations Division’s services (one course), and virtual teamwork (one course).

Conclusion and Recommendation

Eighty-five percent of HUD employees have approved regular telework agreements, and 9 percent of HUD employees have approved remote work agreements. We evaluated OCHCO's controls over the quality of data related to remote work and telework and determined that OCHCO's controls resulted in 99 percent agreement between data sources. OCHCO implemented an additional control over the accuracy of locality payments for remote workers after identifying six employees who received incorrect locality payments.

However, OCHCO did not review location data for regular or situational teleworkers, and we identified potential discrepancies for 11 percent of teleworkers. These potential discrepancies may include telework agreements that were out of date, incorrect official duty stations, or incorrect locality payments.

Employees' supervisors are responsible for enforcing Flexiplace policies. OCHCO offered a variety of training courses designed to support supervisors in overseeing telework and remote work programs and managing employee performance.

WE RECOMMEND THAT THE CHIEF HUMAN CAPITAL OFFICER

1. Implement a process to identify teleworkers most at risk of receiving incorrect locality payments, verify that their official duty stations are correct and they are reporting to their official duty stations as required, and if necessary, correct their locality payments.

There were 626 employees (9 percent of teleworkers) whose official duty stations and self-reported duty stations matched but whose telework worksites were more than the HUD-defined commuting distance of a 50-mile radius from their official duty stations. In addition, 87 of the 139 employees whose official duty stations did not match their self-reported duty stations had telework worksites outside the HUD-defined commuting distance.¹⁷ Some of these employees likely had long commutes. However, others may have incorrect or out-of-date data or may not be reporting to the office as required. OCHCO should develop and implement processes to identify the teleworkers most at risk of receiving incorrect locality payments. That risk could be based on HUD's defined commuting distance or another risk factor that OCHCO considers appropriate. For high-risk employees, OCHCO should verify that employees are reporting to their correct official duty stations as required and verify or correct locality payments as needed.

¹⁷ The 87 employees represent 1 percent of all HUD teleworkers. This includes 71 employees who had less than or equal to 50 miles between their telework worksites and self-reported duty stations and 16 employees who had more than 50 miles between their telework worksites and self-reported duty stations. There were also three employees whose official duty stations were in cities that do not have a HUD office, but we did not count these three employees here because they were likely approved for remote work or mobile work with a remote duty station.

Appendixes

APPENDIX A – AGENCY COMMENTS AND THE OFFICE OF INSPECTOR GENERAL’S RESPONSE

Summary of the Office of the Chief Human Capital Officer Comments and the Office of Inspector General Response

We requested that HUD’s OCHCO provide formal comments in response to our draft report and indicate agreement or disagreement with our recommendation. OCHCO provided formal comments and agreed with our recommendation.

In its formal comments, OCHCO stated that it appreciates HUD OIG’s identification of the potential risk posed by teleworkers with significant distances between their official duty station and telework worksites. If these employees do not report as required to their official worksites, they may receive incorrect locality pay. OCHCO followed up with 30 employees whose telework agreements listed telework worksites more than 1,000 miles from their official duty stations and identified one employee who received incorrect locality payments. The remaining employees received correct locality pay and were either reporting to their duty station as required (4 employees), authorized to not report to their duty station due to a temporary situation (9 employees), or needed to update their telework agreements (16 employees).

We recommended that OCHCO implement a process to identify teleworkers most at risk of receiving incorrect locality payments, verify that their official duty stations are correct and they are reporting to their official duty stations as required, and, if necessary, correct their locality payments. In response to our recommendation, OCHCO submitted a proposed management decision. It will develop a standard operating procedure for reviewing all telework agreements and following up with employees with more than 500 miles between their telework worksites and official duty stations. OCHCO stated it will provide the final standard operating procedure to HUD OIG to close this recommendation. If implemented, this procedure will ensure that locality payments will be reviewed for employees most at risk for receiving incorrect locality pay due to the distance between their official duty stations and telework worksites. We agree with this proposed management decision. Therefore, the status of the recommendation is “resolved-open.” The estimated completion date is December 31, 2024.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

CHIEF HUMAN CAPITAL OFFICER

September 24, 2024

John Garceau
Acting Assistant Inspector General for Evaluation
HUD Office of Inspector General
451 7th Street, SW
Washington, DC 20024

Dear Mr. Garceau:

The Office of the Chief Human Capital Officer (OCHCO) appreciates the opportunity to review and comment on the HUD Office of Inspector General (HUD OIG) draft report entitled, "The U.S. Department of Housing and Urban Development's Use and Oversight of Telework and Remote Work" (2024-OE-0004). In the draft report, HUD OIG makes one recommendation to OCHCO intended to improve oversight of locality pay for teleworkers.

As shown in the report, OCHCO has taken seriously its oversight of locality pay for remote workers, which is determined by the location of their alternative worksite. OCHCO has also ensured that supervisors are thoroughly trained in managing teleworkers and remote workers.

We appreciate HUD OIG's identification of the potential risk that some teleworkers may receive inaccurate locality pay because they are not reporting as required to their official HUD worksite due to the significant distance between their official duty station and the alternative worksite where they telework. With the interim assessment data that HUD OIG provided to OCHCO during the evaluation, we took the opportunity to follow up on a subset of the employees HUD OIG identified as having commutes of more than 1,000 miles to identify whether any are potentially receiving incorrect locality pay. Of the 30 cases we researched, which was over half of the total number of such potential cases identified by HUD OIG, we found that one employee was receiving incorrect locality pay, which is being corrected. This accords with HUD OIG's finding that the risk for incorrect locality payments for teleworkers is low. The remaining employees we reviewed are paid according to the correct locality pay area. The majority of these employees needed to update their flexiplace agreement form due to a job location change, personal relocation, or typographical error on the original form where they selected the incorrect value in the dropdown menu for the state of their alternative worksite. Nine employees' flexiplace agreements reflected temporary continuous situational telework arrangements due to medical issues, detail assignments, HUD office construction, or temporary lack of space in their assigned HUD office. In these cases, the employees were expected to return to reporting to their official worksite as soon as the temporary situation ended, and the regulations governing locality pay authorize agencies to exempt employees from reporting to their assigned duty station in such cases. Four employees have been confirmed to undertake commutes of over 1,000 miles each pay period to report to their official HUD work location as required, which they are at liberty to do at their own cost.

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Although the risk of incorrect locality pay is low, we concur with the recommendation to implement a risk mitigation process to identify teleworkers most at risk of receiving incorrect locality payments. We plan to review all telework agreements annually to identify and follow up on any employees who have over 500 miles between their official duty station as designated in the payroll system and their alternative worksite, to ensure that they are reporting as required to their official duty station, which is the basis of their locality pay entitlement. We plan to establish a standard operating procedure for this process by December 31, 2024. Attached are the details of our planned action in response to the recommendation.

I would also like to express appreciation for HUD OIG's attention to the topic of remote work and telework. The current landscape of remote and telework is changing swiftly across all sectors, including the Federal Government, as employers adjust the use of this flexibility to best meet business and workforce needs. Indeed, HUD's own use of telework has changed in the nine months since the effective date of the data reviewed by HUD OIG. For example, the percentage of full-time GS employees with regular telework agreements who are scheduled to work in the office two days per pay period has declined from 76% to 51%, while the percentage who work in the office 3-4 days per pay period has increased from 19% to 43% as HUD program offices continue to evaluate and adjust the use of this program to best accomplish the HUD mission.

Once again, thank you for the opportunity to comment on the draft report. If you have any questions, please contact our Audit Liaison Rassi Elliott in HUD's Office of Accountability, at 202-402-5231.

Sincerely,

Lori A. Michalski

Lori Michalski
Chief Human Capital Officer

Attachment

APPENDIX B – SCOPE, METHODOLOGY, AND LIMITATIONS

We completed this evaluation under the authority of the Inspector General Act of 1978 as amended and in accordance with the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency (December 2020).

Scope

The scope of this evaluation was April 25, 2022, when HUD ended the maximum telework status implemented during the Coronavirus Disease 2019 pandemic, to January 13, 2024, the last day of the 2023 pay period year. We limited the analysis of human capital data to full-time, permanent, GS-level employees. With the exception of reporting on the number and percentage of HUD employees who were mobile workers, we excluded mobile workers from the scope of our evaluation. OCHCO provided us with a consolidated data table that included HUD’s human capital data from the National Finance Center database¹⁸ as of January 13, 2024, and Flexiplace agreements as of January 27, 2024.

OCHCO reviewed the self-reported duty stations on new remote workers’ Flexiplace agreements every other pay period. To ensure that we did not include agreements that had not yet gone through OCHCO’s quality control process, we excluded from the analysis of remote workers’ locality pay employees who had remote work agreements that were four or fewer pay periods old at the time that OCHCO pulled the data.¹⁹ However, we did not exclude the Flexiplace agreements that were four or fewer pay periods old from our analysis of Flexiplace schedules’ adherence to policy because OCHCO did not review agreements for compliance on a set schedule. We also did not exclude telework agreements that were four or fewer pay periods old from our analysis of telework duty stations because OCHCO did not review the location data for these agreements.

Methodology

We conducted an analysis of the quality of HUD’s data by comparing data from the National Finance Center database with Flexiplace agreements. We examined the schedules employees submitted on their Flexiplace agreements and compared them with Flexiplace agreement types and HUD’s human capital designations. We used Flexiplace agreement type to calculate the number of teleworkers and remote workers.²⁰

Flexiplace applications require employees to fill out their alternative worksite and self-report their duty station. We compared the official duty stations and locality codes²¹ from the National Finance Center database with the self-reported duty stations listed on Flexiplace agreements. Lastly, we identified the coordinates of teleworkers’ official duty stations and telework worksites using city and State names and

¹⁸ HUD has a shared services agreement with the U.S. Department of Agriculture’s National Finance Center to process payroll.

¹⁹ We excluded agreements signed by the Flexiplace coordinator after November 18, 2023.

²⁰ There were minor discrepancies in the number of teleworkers and remote workers depending on whether we used HUD’s designations in the National Finance Center database, Flexiplace agreements, or the schedules listed on Flexiplace agreements.

²¹ Locality pay areas are established and modified under 5 U.S.C. chapter 5304. Each locality pay area is assigned a code, and OPM publishes annual locality pay rate tables listing the locality pay rate for each code.

of self-reported duty stations using full address data. We calculated the straight-line distances between employees' telework worksites, official duty stations, and self-reported duty stations.

We provided our analysis of duty stations to HUD for review before the issuance of the draft report and incorporated its feedback into our findings.

We conducted four group interviews with senior and staff-level individuals from OCHCO and analyzed relevant documentation. We also analyzed data on training courses offered by OCHCO's Talent Development and Workforce Planning and Office of Human Capital Services divisions.

Limitations

The data OCHCO provided us from the National Finance Center database and the Flexiplace agreements database were dated 2 weeks apart. This means that HUD may have changed some employees' official duty stations during those 2 weeks but those changes would not be reflected in the data used in our analysis.

HUD provided the city, State, and county of employees' official duty stations from the National Finance Center database. HUD also provided only city, State, and county data for alternative worksites from Flexiplace agreements to preserve employee privacy. We identified coordinates by geocoding cities and States. Geocoding provides a best match result (approximate matching). Because of the lack of specificity of city and State data, it is possible for the Geocoder to return incorrect results. We manually examined rows we identified as having a high potential for errors in the identification of coordinates, such as records that returned foreign addresses. Spelling errors in city names generally did not affect the distance calculation.

APPENDIX C – GLOSSARY

1. **Agency worksite:** The HUD office to which HUD has assigned a nonremote employee to perform the duties and responsibilities of their position.
2. **Alternative worksite:** A location other than the agency worksite from which HUD has approved an employee to work under a telework or remote work arrangement.
 - a. **Telework worksite:** An alternative worksite for a teleworker.
 - b. **Remote worksite:** An alternative worksite for a remote worker.
3. Duty station:
 - a. **Official duty station:** For the purposes of this report, the location used to determine an employee's locality payments. For telework employees, this is the employee's agency worksite. For remote employees, this is the employee's remote worksite. HUD's human capital data in the National Finance Center database include employees' official duty stations.
 - b. **Self-reported duty station:** HUD's Flexiplace application includes a field for employees to enter their "current official duty station address." We use this term to refer to employees' answers to that question.
4. **Flexiplace:** The name of HUD's telework, remote work, and mobile work program.
5. **Flexiplace agreement:** HUD's term for the statutorily required written agreement that an employee enters into with management, which authorizes the employee to work from an alternative worksite and outlines the specifics of the work arrangement. The Flexiplace application includes the Flexiplace agreement, which must be signed by the employee and supervisor.
 - a. **Remote work agreement:** A Flexiplace agreement for a remote worker.
 - b. **Regular telework agreement:** A Flexiplace agreement for a regular teleworker.
 - c. **Situational telework agreement:** A Flexiplace agreement for a situational teleworker.
6. **Flexiplace application:** The documentation that HUD employees are required to submit to apply to participate in HUD's Flexiplace program. This documentation includes both the Flexiplace application and agreement form and documentation showing that the employee completed required training.
7. **Locality pay or locality payments:** A geographic-based percentage rate paid to employees in addition to their base salary under 5 U.S.C. chapter 5304. It is intended to reduce the discrepancies in certain geographic areas between GS pay rates and the salaries of non-Federal workers doing the same level of work.
 - a. **Locality pay area:** The geographic areas to which different locality pay rates have been assigned.
 - b. **Locality pay rate:** An employee's base pay plus a percentage of that base pay. The percentage is determined by the locality pay area of the employee's official duty station. OPM publishes annual percentages for each locality pay area.
 - c. **Mobile work:** An arrangement in which an employee routinely and regularly performs the duties and responsibilities of their position from customer or other worksites (for example, site inspections).

8. **Remote work:** An arrangement in which an employee performs the duties and responsibilities of their position from a remote worksite instead of an agency worksite without reporting to an agency worksite at least twice per pay period.
9. **Telework:** A voluntary work flexibility arrangement in which an employee performs the duties and responsibilities of their position from an agency worksite but is also approved to work from a telework worksite.
 - a. **Regular telework:** An arrangement in which an employee works from an agency worksite at least twice per pay period but also works from an approved telework worksite on a regular and recurring basis of at least once per pay period.
 - b. **Situational telework:** An arrangement in which an employee normally works from an agency worksite but may request to work from their approved telework worksite when the need arises.

APPENDIX D – TRAINING COURSES OFFERED BY HUD TO SUPPORT OVERSIGHT OF TELEWORKERS AND REMOTE WORKERS

Between April 25, 2022, and January 13, 2024, OCHCO delivered a total of 57 training courses to help supervisors oversee remote and teleworking employees.

Training courses offered to supervisors related to telework and remote work programs

Training course topic	Number of courses	Delivery method	Course frequency
HUD Flexiplace program	6	Virtual	Multiple dates (2 courses), single date (2 courses), biweekly (2 courses)
Leadership and management	15	In person (2 courses), virtual (13 courses)	On demand (8 courses), single date (3 courses), multiple dates (4 courses)
Team development and collaboration	5	Virtual	Multiple dates (3 courses), single date (2 courses)
Communication and performance	2	Virtual	Multiple dates (1 course), on demand (1 course)
Personal and professional development	5	Virtual	On demand (5 courses)
Remote work and productivity	2	Virtual	Single date (1 course), multiple dates (1 course)
Telework compliance	1	Virtual	On demand (1 course)
Total number of courses	27*		

Source: Data provided by HUD for the period April 2022 to January 2024

* The column “Number of courses” describes the number of training courses OCHCO offered that covered the associated training topic. Some courses covered multiple topics; therefore, the sum of the entries in this column exceeds the total number of specific courses.

Training courses offered to supervisors related to managing poor performance

Training course topic	Number of courses	Delivery method	Course frequency
Performance management	21	Virtual	Multiple dates* (2 courses), on demand (10 courses), monthly (1 course), single date (5 courses), no date specified (4 courses)
Employee relations and labor relations issues	1	Hybrid	Multiple dates (1 course)
Basic tenets of employee relations and managing performance and conduct	4	Virtual	Multiple dates (2 courses), single date (1 course), on demand (1 course)
Supervisory skills	2	Virtual	Multiple dates (2 courses)
Overview of the Employee Labor Relations Division's services	1	Hybrid	Multiple dates (1 course)
Virtual teamwork	1	Virtual	Single date (1 course)
Total number of courses	30		

Source: Data provided by HUD for the period April 2022 to January 2024

* OCHCO offered one course on multiple dates and on demand.

APPENDIX E – ABBREVIATIONS

Abbreviations	Definitions
CFR	Code of Federal Regulations
GS	General Schedule
HUD	U.S. Office of Housing and Urban Development
OCHCO	Office of the Chief Human Capital Officer
OPM	U.S. Office of Personnel Management
U.S.C.	United States Code

APPENDIX F – ACKNOWLEDGEMENTS

This report was prepared under the direction of John Garceau, Acting Assistant Inspector General for Evaluation; Christopher Backley, Director of the Program Evaluations Division; and Kaitlyn Large, Assistant Director of the Program Evaluations Division. The Office of Evaluation staff members who contributed are recognized below.

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