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Subject: Survey of HUD Employees Regarding Telework and its Impact on HUD Operations during COVID-19 Pandemic

The attached memorandum report summarizes survey and interview responses related to mandatory telework on Department of Housing and Urban Development (HUD) operations due to the novel coronavirus disease of 2019 (COVID-19) pandemic. Survey results indicated some moderate or significant impacts on HUD operations. However, most processes were only slightly impacted or not impacted at all by mandatory telework.

Respondents reported HUD was generally well prepared for mandatory telework. HUD had implemented various information technology (IT) approaches that facilitated a successful telework experience. Although legacy IT systems continue to hinder HUD's ability to modernize multiple programs, HUD was able to modernize and fast-track one process to accept electronic loan files that previously could only be processed with paper records within HUD offices, which minimized the impact on this specific operation.

HUD Office of Inspector General conducted surveys and held virtual interviews to collect the data that supports the findings in this brief. We received responses from the majority of HUD program offices. Not all HUD processes may be represented because the survey methodology was limited in scope to allow for timely reporting.

Please do not hesitate to contact me at 202-402-5832, or a member of your staff may contact John Garceau, Information Technology Evaluations Division Director, at 202-603-8410 or jgarceau@hudoig.gov, should you wish to discuss the document.

Enclosure: *Telework Impact on HUD's Operations Due to the COVID-19 Pandemic*

Telework Impact on HUD's Operations Due to the COVID-19 Pandemic

This memorandum report summarizes survey and interview results on the impact mandatory telework is having on U.S. Housing and Urban Development's (HUD) operations. The HUD Office of Inspector General (OIG) conducted surveys and interviews to evaluate HUD's use of agency-wide telework in response to the novel coronavirus disease of 2019 (COVID-19) pandemic. The study was designed to provide insights into the types of obstacles that impeded HUD operations and how HUD responded to identified limitations. HUD demonstrated a capacity to sustain mission essential operations during a period of mandatory telework, but some processes were severely impacted.

Summary

The President declared a National Emergency on March 13, 2020 as the rates of COVID-19 infection continued to rise within the United States and around the world. The Office of Management and Budget (OMB) issued a series of memorandums to Federal Agencies addressing increased use of telework during the pandemic.[1] On March 17, 2020, OMB Memorandum 20-16 directed agencies to maximize telework for the Federal workforce. HUD deployed mandatory telework for its employees nationwide as part of an evacuation order on March 20, 2020. Access to all HUD offices was permitted only when required for mission critical functions.

We discovered three major themes during our study. First, telework severely impeded business processes dependent on paper records or facility access. Second, bandwidth constraints with the HUD information technology (IT) infrastructure and the lack of government-furnished equipment for some employees disrupted HUD operations. Third, respondents reported HUD was generally well prepared for mandatory telework.

Although there were impacts due to mandatory telework, most survey respondents indicated that operations they oversee were only slightly impacted or not impacted at all, as depicted in figure 1 below. However, 22 percent of respondents reported that processes were moderately or significantly impacted by telework.

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[1] OMB Memorandum M-20-13 was issued on March 12, 2020 and encouraged agencies to make use of telework flexibilities. OMB memorandum M-20-15 was issued on March 15, 2020 and provided updated guidance on telework flexibilities in the National Capital Region.
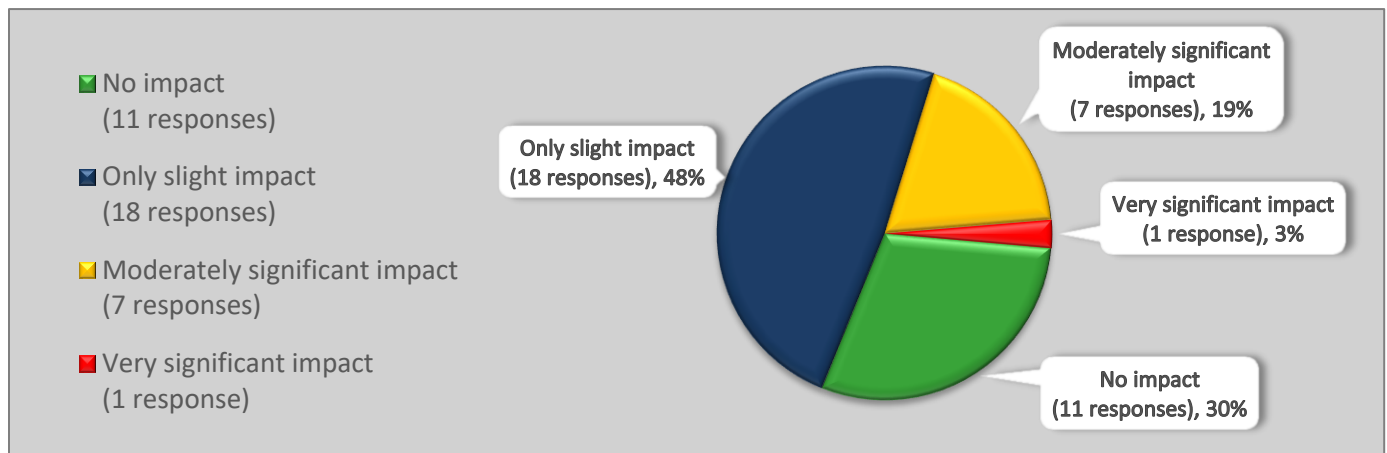
Figure 1. HUD work process impact survey results

Methodology

We contacted 37 HUD employees throughout HUD and solicited feedback regarding how mandatory telework impacted their program office job functions as a result of the COVID-19 pandemic.[2] We received approximately one-third of the responses from HUD's Information System Security Officers (ISSO); one-third from office directors; and the remaining third from employees serving in various roles such as Deputy Assistant Secretary, Administrative Officer, and Specialist. One response was provided anonymously. Twenty-five HUD employees provided responses to a written survey form, and 12 provided responses to the same questions during virtual interviews with OIG.[3]

OIG's Information Technology Evaluations Division (iTED) administered the written surveys through a web-based form[4] that allowed HUD employees to quickly provide feedback. We distributed survey invitations to HUD's ISSO covering most program offices. The ISSOs facilitated a response from each of their respective offices within HUD.

HUD OIG's Program Evaluations Division and iTED administered the interview-based surveys during previously scheduled meetings with various HUD officials. HUD OIG used these existing meetings to conduct interviews as a way to minimize disruption to HUD during its COVID-19 response efforts.

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[2] HUD OIG sent surveys to 22 Information System Security Officers and received responses directly from 12 ISSO's representing their various HUD program offices. The 10 other ISSO's passed the survey to other officials within their offices whom they believed would be better positioned to respond, such as office directors, resulting in 13 additional survey responses. The remaining 12 responses were received from HUD employees interviewed as part of HUD OIG's ongoing work.

[3] Three of the 12 virtual interviews each included multiple HUD employees, yet were treated as a single response for reporting purposes within this memorandum report. In total, thirty HUD employees serving in various roles attended these three interviews and had the opportunity to provide comments. The remaining nine virtual interviews each included one HUD employee.

[4] HUD OIG used HUD's Microsoft Teams and associated Office 365 IT technology to administer the survey. This technology was previously implemented by the HUD Office of the Chief Information Officer (OCIO) and was integral in facilitating telework capabilities.

We reviewed employees' responses and summarized the results within this memorandum report. We believe the survey responses included an appropriate cross-section of primary HUD program offices and employee roles sufficient to meet the study objectives.

Although the study results provide insight into HUD's experience with mandatory telework, the methodology used was not intended to provide a comprehensive assessment of HUD's telework operations. The surveys were intentionally brief to allow for quick responses and timely reporting of the results.

We specifically mention HUD processes and programs within this topic brief. However, the primary intent of the study was to identify the types of challenges experienced across the Department and not necessarily to identify a complete list of specific tasks and HUD program operations that were impacted.

The results are based on information provided by the HUD employees surveyed and OIG did not perform testing to validate the statements of those employees. HUD OIG will remain alert to indications of operational limitations within HUD's telework environment during the COVID-19 pandemic and consider conducting further study or review if warranted.

Study Results

1. Telework Severely Impeded Processes Dependent on Paper Records and Facility Access

Processes dependent on paper records or processes requiring access to facilities were severely disrupted. Of the 37 survey respondents, 15 indicated that HUD processes were scaled-back, changed, or suspended because access to records or facilities was limited during mandatory telework. HUD took steps to address these limitations when possible. The following are examples of the types of challenges HUD experienced.

- The Federal Housing Administration's (FHA) ability to receive and process single family forward and home equity conversion mortgage (HECM) paper case binders from lenders was restricted. Although lenders electronically submit many FHA loan files to HUD for insurance endorsement, some loans are still submitted in paper form. To address this limitation, FHA accelerated the deployment of its "FHA Catalyst" system, which expands HUD's capacity to receive loan files electronically.
- HUD's on-site monitoring reviews of FHA single family lenders are suspended indefinitely. Although HUD adapted its FHA Catalyst system to receive FHA loan files during the insurance endorsement process, HUD did not implement a solution to receive loan files as part of its post-endorsement quality assurance loan review process. FHA's oversight efforts continued through off-site reviews of electronic loan files and some hardcopy loan files that HUD employees scanned before leaving their offices for mandatory telework.
- Oversight and enforcement activities of multiple HUD offices for on-site housing inspections are suspended. In one instance, HUD continued inspections using temporary employees.

- Scheduled training for HUD employees and external customers is impacted or canceled. In one case, HUD used remote conferencing software to conduct training to overcome this challenge.
- Responses to Freedom of Information Act (FOIA)[5] requests are severely reduced because employees' access to paper records in HUD office space is limited.
- HUD is generally unable to receive and process mail due to limited building access. This lack of access may cause processing delays for items such as Fair Housing and Equal Opportunity complaints and FHA borrower requests for mortgage insurance premium refunds.
- HUD employees' access to historic contracts and reference documents maintained in paper form is impacted due to limited building access.
- Employees are generally unable to coordinate required signatures and notarizations for paper documents, such as contracts with external entities and internal policy review concurrence forms. Electronic signatures or document scanners are being used when possible to address this limitation.

2. Network Connection Issues and Limited Access to IT Resources Disrupted Operations

Operations are impacted to varying degrees depending on the type of network connection and access HUD employees and contractors have to IT resources. Authorized HUD employees and contractors can access HUD systems remotely using either government issued laptops or, when necessary, their personal computers. In February 2020, HUD began testing the remote access capacity of its IT environment in preparation for the possibility of mandatory telework. While teleworking, access to peripheral IT resources (e.g., printers, scanners, and monitors) varies based on what equipment each employee was issued for remote use prior to mandatory telework and what personal resources they have available. Of the 37 survey respondents, 12 cited network connection issues or access to IT and communication resources as impediments to their work processes. The following are examples of the types of challenges encountered.

- Access to HUD's computer networks is sometimes intermittent and slow. Some employees or contractors do not have access to government issued laptops. Connection speeds are even worse for these employees when using their personal computers. In one instance, employees were temporarily placed on administrative leave due to connectivity issues. These employees were able to resume work after HUD issued wireless access point devices to facilitate network access. To address bandwidth problems that can slow network access, HUD's Office of the Chief Information Officer (OCIO) requested that HUD employees avoid using Virtual Private Network (VPN) connections except when this was needed to access HUD's network systems or applications.
- Personal printers and scanners are unavailable or unreliable in some cases, resulting in operational delays.
- Employees who do not have access to external computer monitors find it more difficult to complete certain work using only the laptop screen.

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[5] The Freedom of Information Act provides the public the right to request access to records from any Federal agency.

- Some HUD employees that interface with the public did not have government issued telephones to use while teleworking. To address this, HUD acquired telephones for the affected employees.
- Telephone bridge circuits used for conference calling experienced issues and were not always available for employees to use. Video conferencing software programs, such as Microsoft Teams and Skype, were being used extensively to conduct remote meetings, trainings, and presentations. At least one office indicated these remote communication tools were being used to administer oaths for newly hired staff.

3. Respondents Reported HUD Was Generally Prepared for Full-Time Telework

Overall, respondents reported HUD was well prepared for mandatory telework. The Telework Enhancement Act of 2010 required that each executive agency establish a telework policy and incorporate telework into its continuity of operations plan.[6] According to a recent U.S. Office of Personnel Management (OPM) report,[7] as of Fiscal year 2018, 91 percent of HUD employees were eligible for telework participation and 82 percent were teleworking during the year. With this existing telework experience and capacity in place, HUD employees are maintaining a high level of service continuity during the COVID-19 pandemic. Although employees encountered some difficulties and processes were impacted as indicated above, HUD was generally able to quickly adapt and continue performing its essential functions. Many of the survey respondents indicated that switching to mandatory telework had no negative impact or only a slight impact on their work. One survey respondent summarized this point by stating,

> *"Five years ago I don't think it would have been possible to pick up and leave without missing a beat. But that is essentially what we did." – HUD employee*

In some cases, mandatory telework reportedly resulted in benefits to the Department and employees, such as an increase in employee productivity and a reduction in costs. For example, one respondent noted that office construction work could now be completed more quickly and at reduced cost because work ordinarily performed after-hours or when offices were empty could now be done during normal business hours. Lastly, all 37 survey respondents indicated that IT systems were available to support their work.

Despite these successes, government furnished IT resources, such as laptops and cell phones, were not available to every employee, resulting in impacts to various program offices and their employees as identified in previous sections of this memorandum report. In addition to disrupting operations, these HUD IT resource limitations also present additional cybersecurity risks. On May 11, 2020, OCIO issued a message to HUD system users asking them to take extra precautions to protect HUD's information and networks from risks associated with working remotely. OCIO asked that users only access HUD's network or applications with HUD issued laptops and devices. However, of the 37survey respondents, seven, or 19 percent, stated that one or more employees or contractors do not have HUD-issued laptops, indicating that some users may not be able to fully comply with the OCIO's

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[6] *See* 5 U.S.C. § 6502(a) (1), and 5 U.S.C. § 6504(d) (1)
[7] Fiscal Year 2018 Status of Telework in the Federal Government, Report to Congress, (March 2020). Available at https://www.telework.gov/reports-studies/reports-to-congress/2019-report-to-congress.pdf

guidance. The OCIO's message to HUD users also noted that to conserve network bandwidth employees should avoid using VPN connections except when necessary to access HUD systems or applications. The selective use of VPN connections by HUD employees increases cybersecurity risks if users do not take proper precautions and transmit sensitive information without encryption.

Conclusion

HUD's use of mandatory telework in response to the COVID-19 pandemic significantly impacted some work processes, yet respondents reported HUD was generally well prepared and continues performing its mission essential functions. Additionally, HUD employees took steps to mitigate limitations they encountered while working remotely. The impact of mandatory telework on HUD processes may continue to expand as offices remain closed.

We recognize that HUD's response to the COVID-19 pandemic remains fluid and an issue today might be replaced by another tomorrow. Additionally, we are encouraged by the proactive steps we identified HUD taking to address several of the limitations we identified during the course of this study. We suggest HUD consider taking proactive steps to:

1. continue leveraging agency approved collaboration tools and other technology resources to the greatest extent practicable and appropriate;

2. ensure employees are properly informed regarding the availability and proper use of any new tools and processes, such as electronic signatures or virtual notary services;

3. monitor processes that have been, or may become, negatively impacted by full-time telework;

4. prioritize plans for reopening offices that account for work processes that are canceled or suspended during telework;

5. further evaluate network connectivity issues affecting employees during telework;

6. continue to assess the need for government furnished equipment such as phones, laptops, and peripheral IT devices;

7. consider steps necessary to address cybersecurity risks related to increased use of employee's personal computers for government business; and

8. consider implementing a policy based routing configuration for VPN traffic to improve network performance and eliminate the need for users to selectively turn off VPN connections.

HUD OIG will continue to monitor and work with HUD as necessary to identify additional impacts due to the COVID-19 pandemic.