DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

SALARIES AND EXPENSES, HOUSING AND URBAN DEVELOPMENT

BUDGET ACTIVITY 6: FAIR HOUSING AND EQUAL OPPORTUNITY

The consolidated discussion for the appropriation "Salaries and Expenses, HUD" is shown in Part 3 of the Justifications. All data are presented on a comparable basis for the 3 fiscal years 2002, 2003 and 2004.

SCOPE OF ACTIVITY

The Office of Fair Housing and Equal Opportunity (FHEO) enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing and housing related transactions based on race, color, religion, sex, national origin, disability or family composition. The Assistant Secretary for FHEO administers and enforces laws that ensure equal access to housing, guarantees equal opportunity in all HUD programs and prohibits, to a limited extent, discrimination in employment with respect to HUD programs.

The 1988 amendments have greatly increased the Department's enforcement role. First, the newly protected classes have proven significant sources of new complaints. Second, HUD's expanded enforcement role took the Department beyond investigation and conciliation into the mandatory enforcement area. The Office of FHEO investigates complaints filed with HUD. If the complaint is not successfully conciliated, FHEO determines whether there is reasonable cause that a discriminatory housing practice has occurred. When reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a Determination, as well as a Charge of Discrimination, and a hearing is scheduled before a HUD administrative law judge.

The Office of FHEO also has the responsibility for administering Section 3 of the Housing and Development Act of 1968. To the greatest extent feasible, this Act requires recipients of federal funds to employ and train project area residents. FHEO is responsible for Section 3 policy interpretation, training of HUD program staff and recipients, compliance reviews, processing Section 3 Grievances, development of Voluntary Compliance Agreements (VCA) and recommending enforcement actions to program Assistant Secretaries or HUD's General Counsel.

In January 2002, the Office of Departmental Equal Employment Opportunity (ODEEO) became a sub-component of FHEO. ODEEO is charged with monitoring HUD's Affirmative Employment Program (AEP) and providing guidance in the development and implementation of Program Offices' AEP Plans. ODEEO is responsible for implementing the Department's Alternative Dispute Resolution (ADR) Program, which is required by the Equal Employment Opportunity Commission's (EEOC) Regulation 29 CFR 1614.102(b)(2). ODEEO also processes employment discrimination complaints filed by HUD employees, former employees and applicants for employment.

FHEO contribute to these goals and will continue to develop and implement programs that:

- Ensure equal opportunity and access to housing;
- Support community and economic development efforts;
- Embrace high standards of ethics, management and accountability; and
- Strengthen and expand faith-based and community partnerships that enhance communities.

The strategic objectives contained in the Annual Performance Plan (APP) will be advanced by empowering the public, and encouraging networks of State and local fair housing enforcement agencies and private fair housing organizations. An informed and educated public, real estate industry and housing finance industries, along with effective enforcement, will assist in affirmatively furthering fair housing.

WORKLOAD

HUD anticipates that its intensified education and outreach efforts, and that of the FHAP agencies, will result in an increase in complaints. The requested Salaries and Expenses budget proposes a commensurate increase in staffing resources to address the anticipated increase in complaints.

Finally, additional resources are necessary for fair housing enforcement in FHIP, FHAP, and HUD's Salaries and Expenses budgets for several other reasons.

First, HDS 2000 and HUD's mortgage lending study entitled "All Other Things Being Equal" indicate some groups continue to experience high levels of discrimination in the residential rental, sales, and mortgage markets. Additional resources will make it possible for the Department and its FHIP and FHAP partners to initiate more agency-initiated enforcement actions, on behalf of persons who experience discrimination but are unfamiliar with their rights or the administrative processes of the Agency.

Second, several recent studies conducted by HUD and others indicate that Federal fair housing enforcement should conduct more fair housing testing, which has been proven to be one of the most effective tools in identifying unlawful discrimination. Most people who experience discrimination do not realize it; testing provides controlled, comparative data to corroborate allegations of discrimination. Increased funding for testing in FHIP, FHAP, at HUD helps probe the merits of a case and expedite investigations.

The principal workload of Fair Housing and Equal Opportunity consists of processing and investigating housing discrimination and Departmental Equal Employment Opportunity complaints, implementing civil rights requirements in HUD programs, conducting compliance reviews, managing grants to fair housing organizations, reimbursing fair housing agencies for investigating housing discrimination complaints and implementing voluntary programs.

Headquarters. FHEO Headquarters is responsible for:

- Establishing national policies that guide the conduct of its civil rights enforcement;
- Oversight of civil rights and affirmatively furthering fair housing requirements in HUD programs;
- National policy for administering FHIP and FHAP;
- Working with other federal agencies to formulate Memoranda of Understanding (MOU) to bring about greater coordination in the enforcement of civil rights laws;
- Establishing national policy guiding the enforcement of the Section 3 program, which
 requires HUD Grant Recipients, to the greatest extent feasible, to employ and train
 project area residents;
- Administering programs under various statutes and executive orders to ensure equal employment opportunities for all past and present HUD employees and job applicants; and
- Periodically reviewing and commenting on the automated underwriting systems of Fannie Mae and Freddie Mac for actual or potential violations of the Fair Housing Act.

Field. FHEO field offices are responsible for:

- Receiving, investigating, and conciliating complaints filed under the Fair Housing Act, Title VI, and Sections 504 and 109;
- Monitoring FHAP and FHIP recipients for program compliance;
- Conducting civil rights and Section 3 compliance reviews in other programs; and
- Conducting education and outreach programs in communities within their jurisdiction.

STAFFING

The successful enforcement of fair housing laws depends on the work of committed, well-trained, and experienced individuals. However, as committed, trained, and experienced current staff may be, successful enforcement cannot be achieved with an inadequate number of FTEs. The number of FTEs in FHEO has steadily declined over the past several years. During fiscal years through 1994, the number of FTEs in FHEO ranged from 724-740, compared with 584 FTEs in fiscal year 2000.

Performing investigations, especially those involving mortgage lending, is time consuming. Yet, the decrease in staff has required Fair Housing Act investigators and other professional staff to perform additional duties, such as administrative tasks, that reduce the time available for analytical and investigative functions.

As a result, FHEO is increasingly challenged to meet its core responsibilities, including completing Title VIII investigations within the required 100-day time period. The situation will worsen, according to the finding of a recent HUD human resources report, entitled, "Succession Planning," which disclosed that over 60 percent of FHEO employees would be eligible for retirement within the next 2-3 years. This is the highest percentage in the Department.

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Furthermore, the vast majority of those will be skilled professionals, including investigators and equal opportunity specialists. These staffing classifications carry out the basic civil rights enforcement and compliance functions, which are the backbone of FHEO. In the field, increased complaint processing delays and difficulty eliminating complaint backlogs are certain results.

Current statistical data confirm the severity of FHEO staff deficiencies. Two recent studies, HUD's Resource Estimation and Allocation Process (REAP) and the National Council on Disability's (NCD) Reconstructing Fair Housing report, concluded that FHEO is inadequately staffed to carry out its responsibilities. The results of these studies support an internal analysis of FHEO's staffing deficiencies.

To maintain its current performance level, increase enforcement actions, address emerging forms of housing discrimination, prepare for the retirement of skilled employees, and fully carry out all of its statutory responsibilities, it is critical that the number of FTEs in FHEO be increased. FHEO is requesting 758 FTEs for fiscal year 2004.

TRAVEL

Figures for the travel expenses of FHEO headquarters and field staff are reflected in this table

	ACTUAL 2002	ESTIMATE 2003	ESTIMATE 2004	INCREASE + DECREASE - 2004 vs 2003
		(Dollars in	Thousands)	
Travel (HQ)	\$505	\$400	\$400	
Travel (Field)	610	455	498	+43
Total	1,115	855	898	+43

The 2004 Budget for FHEO proposes a total funding of \$855,000 for travel of headquarters and field staff. This amount represents a decrease of \$257,000 for fiscal year 2003. Travel funds are required for FHEO to conduct enforcement, education, and training activities as described below.

Enforcement. Travel is required to conduct the following enforcement activities:

- To conduct Section 504 and Section 3 compliance reviews of HUD programs;
- To support efforts of organizations such as ADAPT and DRACH to identify cities or HUD recipients with major noncompliance issues;
- ullet To monitor EEO complaint processing activities and performance of contract investigations and alternate dispute resolutions.

 $\underline{\mathtt{Education}}.$ Travel is required to conduct the following education activities:

- To implement the Department's congressionally mandated Education and Outreach Plan on the accessibility requirements of the Fair Housing Act, including the FHIP National Model Codes:
- To conduct conferences on Section 504, ADA, and FHA, and provide other forms of technical assistance.

Training. Travel is required to conduct the following training activities:

- FHIP/FHAP policy training conference and the fair housing summits;
- training of field staff on the requirements of the Fair Housing Act and other fair housing laws, the revised ADA/ABA standards for accessible design, and the various safe harbors for the Fair Housing Act;
- attend training sessions on the requirements of the Quality Housing and Work Responsibility Act of 1998;
- attend conferences sponsored by EEOC, OPM, and HUD contractors on preparing Affirmative Employment plans and Affirmative Action and Managing Diversity plan;
- obtain EEO specialist certification.

CONTRACTS

Figures for both the Office of Fair Housing and Equal Opportunity and the Office of Equal Employment Opportunity, a sub-component described below, are reflected in this table.

	ACTUAL 2002	ESTIMATE 2003	ESTIMATE 2004	INCREASE + DECREASE - 2004 vs 2003
		(Dollars in	Thousands)	
Public Information Services	\$67	\$55	\$90	+\$35
Technical Services	1,525	1,279	1,633	+354
General Support	188	197	250	+53
Total	1,780	1,531	1,973	+442

 $\underline{\text{Public Information Services}}.$ Under this component, resources will be used for the following:

- To educate citizens on housing discrimination and to develop outreach and marketing strategies related to accessible design and construction, reasonable accommodation and familial status. Marketing strategies must build general awareness of the protections offered and the specific responsibilities of housing providers under the Act. Increased funding in fiscal year 2004 will allow for continual updating, developing and disseminating of fair housing information to the public.
- Education and outreach campaign designed to reach out to the Limited English Proficiency (LEP) communities throughout the United States. The campaign would make both federally conducted civil rights program requirements and Title VI policy guidance widely available to LEP advocates and communities. The campaign will also develop Title VIII and other civil rights related brochures.
- Other Public Information services would include distribution of the Fair Housing Initiative Program (FHIP) Notice of Funding Availability (NOFA) and FHIP work products.

Technical Services. Under this component, resources will be used for the following:

- The Equal Employment Opportunity (EEO) responsibilities have been restored to FHEO. Funding is required for EEO contract investigations, the continuation of the Department's Diversity Program, the preparation of Final Decisions reports and for Alternative Dispute Resolution (ADR) activities needed to reduce the backlog of EEO complaints. The EEOC has mandated in their latest regulations that all agencies have an ADR Program. Funding is included for the training of all managers, supervisors and staff on the use of HUD's ADR Program. Additionally, funding is needed for ODEEO to maintain and enhance its automated complaint and correspondence tracking system and to integrate applicant flow data.
- Section 504 and American with Disabilities Act Technical Assistance which would include development of informational materials and provide direct assistance through a series of seminars in major cities, the Internet, mailings, and workshops at housing provider conferences. This assistance would be earmarked for Public and Assisted Housing Providers and CPD entitlement grant recipients.
- Architectural Consulting Services to support enforcement requirements related to accessibility and addressing the design and construction guidelines under 42 USC 3604 (f)(5). The services will assist in analyzing design and construction complaints.
- Contract with statistical and analytical experts in insurance and mortgage lending to assist in analyzing and investigating complex lending and insurance complaints and develop investigatory policies and procedures.
- The Departmental Sign Language Interpreters contract. This contract supports the Department's hearing-impaired employees as well as such persons attending departmental activities and special emphasis events.
- Outside evaluators to read and rate applications submitted under the FHIP NOFA.
- Funding will also support continuation of interagency agreements with the Departments of Labor, State and others to provide indirect cost reviews and rates for FHIP awardees or provide translations of HUD education and outreach brochures.
- GSE Review. The Federal Financial Housing Enterprise Safety and Soundness Act of 1992 mandates that HUD periodically review and comment on the automated underwriting systems of Fannie Mae and Freddie Mac (the GSEs) for actual or potential violations of the F air

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Housing Act (the Act). To obtain the necessary additional expertise necessary to perform this task, HUD will continue using the services of qualified contractors and subcontractors, as needed. The contractor will assist FHEO and other staff from PD&R and OGC to review general literature and individual loan files to determine whether certain aspects of the GSEs' automated systems may be having an adverse disparate impact on minority populations that may violate the Act.

<u>General Support</u>. Slightly increased funding will allow for continual support for FHEO's programs and operational activities. Services provided would consist of court reporters, public service announcements, registration fees, translation cost, on-line information services contracts, developing mortgage lending training curriculum and update software and advertisements.

Fiscal year 2004 Salaries and Expenses Initiative

SPECIAL 2004 INITIATIVES

In fiscal year 2004, FHEO is requesting funding for the following special initiatives.

• National Rental Housing Credit Repository Demonstration. FHEO in conjunction with PD&R and Housing will develop a pilot program that will record rent payments with credit bureaus so that persons in rental housing with good payment histories receive a credit advantage when applying for consumer or mortgage credit. At present, rent payments are not recorded by credit bureaus and so do not affect, positively or negatively, on credit ratings.

Cost Estimate: Approximately \$100,000

- Study on School Resegregation and Housing Discrimination. The Office of Fair Housing and Equal Opportunity (FHEO) desires to obtain highly qualified professional services, with experience in evaluating market conditions and trends, to examine the current status relationship of the resegregation of public school to housing segregation. It has been almost 50 years since the initial Brown v. Board of Education Supreme Court ruling banning segregation and more than a decade into a period in which the U.S. Supreme Court has authorized termination of desegregation orders. These plans are being dissolved by court orders even in some communities that want to maintain them; in addition, some Federal courts are forbidding even voluntary desegregation plans.
- While the 2000 Census results illustrates that the United States has more racial and ethnic diversity than ever before, school data from the year 2000-2001 collected by the U.S. Department of Education indicates that school children are largely isolated from this growing diversity.

FHEO intends to explore through a study the impact of housing discrimination on the resegregation of public schools. The outcome of such a study would provide FHEO with data on possible initiatives that it could pursue individually or in collaboration with DOE to impact school and neighborhood isolation.

Total: \$200,000

• Special Initiative to Reduce Lending Discrimination. FHEO proposes an initiative to combat lending discrimination through hiring and training three investigators with mortgage lending experience who will specialize in conducting lending investigations through use of preapplication paired testing and newly acquired matched pair analysis technology.

• Presently, there are 149 unresolved lending complaints in FHEO's field offices. All of them are aged cases. Many have been open for as long as 2 or 3 years or longer, chiefly because lending investigations are highly technical, requiring specialized skills and knowledge that very few of our present investigators possess. Such a lack, combined with an insufficient number of investigators, are the principal reasons why HUD has found cause or charged in so few lending cases.

Yet, through studies and other evidence, we know that discrimination in lending, particularly mortgage lending, is a major problem blocking minority access to credit. A recent HUD-funded study conducted by the Urban Institute titled "All Other Things Being Equal," found a variety of discriminatory behaviors among lenders using pre-application paired testing, a technique not used in previous investigations of lenders. For example, some banks in the study were found to deny blacks, though not similarly situated whites, basic information about loan amount and house price; other lenders offered Hispanics lower home loans and less assistance understanding the terms and conditions of mortgages than comparable white borrowers.

The most important result of the study, however, is that it demonstrates paired testing to be a viable and effective method for detecting discrimination at the pre-application stage of the mortgage process. In a paired test, two individuals are matched on personal, financial and loan-seeking characteristics, so that the only significant difference between them is race. Then the participants, posing as homebuyers, inquire about home mortgage loans from a lending institution. Investigators analyze the treatment and the terms offered to each for evidence of discrimination. The study concluded that paired testing can be an effective technique for detecting disparate treatment based on race, offering HUD investigators a powerful new approach to conducting more effective lending complaint and Secretary-initiated investigations to combat lending discrimination.

This initiative will hire 3 investigators with specialized mortgage lending experience who, along with selected members of our present staff of investigators in the field, will be intensively trained in techniques of paired testing and the use of innovative technologies to assist with analyses of electronic loan files supplied by lenders under investigation. We request \$500,000 for the initial year of this initiative.

ADMINISTRATIVE EXPENSES

FTE/OBJECT CLASS	ACTUAL 2002	ESTIMATE 2003	ESTIMATE 2004
Fair Housing Assistance Program			
FTE Headquarters	4	11	11
FTE Field	16	20	20
Total FTE	20	31	31
Personal Services	\$1,703	\$2,503	\$2,512
Travel	2	30	30
Total S&E Cost	\$1,705	\$2,533	\$2,542
Fair Housing Initiatives Program			
FTE Headquarters	10	14	14
FTE Field	31	40	40
Total FTE	41	54	54
Personal Services	\$3,343	\$4,505	\$4,915
Travel	41	61	61
Total S&E Cost	\$3,384	\$4,566	\$4,976
Other Fair Housing and Equal Oppor	rtunity		
FTE Headquarters	147	153	153
FTE Field	445	520	520
Total FTE	592	673	673

·	ACTUAL 2002	ESTIMATE 2003	ESTIMATE 2004		
Personal Services	\$50,056	\$58,673	\$60,028		
Travel	1,072	764	80		
Rent, Communications & Utilities	26	32	3		
Printing	81	161	16		
Other Services	1,780	1,531	1,97		
Supplies	275	257	26		
Claims & Indemnities	1				
Total S&E Cost	\$53,291	\$61,418	\$63,26		
FTE Headquarters	161	178	17		
FTE Headquarters FTE Field	492	178 580	58		
-					
FTE Field	492	580	58		
FTE Field Total FTE	492	580 758	58 75 \$67,45		
FTE Field Total FTE Personal Services	492 653 \$55,102	580 758 \$65,681	58 75 \$67,45 89		
Total FTE Personal Services Travel	492 653 \$55,102 1,115	\$65,681 855	58 75 \$67,45 89		
Total FTE Personal Services Travel Rent, Communications & Utilities	492 653 \$55,102 1,115 26	\$65,681 855	58 75		
FTE Field Total FTE Personal Services Travel Rent, Communications & Utilities Printing	492 653 \$55,102 1,115 26	\$65,681 855 32	58 75 \$67,45 89 3		
Total FTE Personal Services Travel Rent, Communications & Utilities Printing Other Services	492 653 \$55,102 1,115 26 81 1,780	\$65,681 855 32 161 1,531	58 75 \$67,45 89 3 16		

Overall Summary of Fair Housing and Equal Opportunity Staff Requirements

	Actual 2002	Estimate 2003	Estimate 2004	Increase + Decrease - 2004 vs 2003
Headquarters	160.8	178.2	178.1	-0.1
Field	492.0	579.6	579.6	0.0
Total	652.8	757.8	757.7	-0.1

Summary of Fair Housing and Equal Opportunity Staff Requirements

	Actual	Estimate	Estimate	Increase + Decrease -
	2002	2003	2004	2004 vs 2003
Headquarters Employment				
Fair Housing and Equal Opportunity				
Immediate Office of Assistant Secretary FHEO and FHEO				
DASs	55.0	62.0	62.0	0.0
DAS for Enforcement & Programs	3.0	3.0	3.0	0.0
Fair Housing Enforcement	40.0	43.2	43.2	0.0
Fair Housing Grant Programs	24.2	31.4	31.4	0.0
Operations and Management Oversight	38.6	38.6	38.5	-0.1
Total	160.8	178.2	178.1	-0.1
Field Employment Fair Housing and Equal Opportunity				
FHEO Field Guidance and Direction	42.0	45.0	45.0	0.0
FHEO Field Intake Processes	70.9	87.4	87.4	0.0
Fair Housing Complaint Processing	200.3	239.7	239.7	0.0
FHEO Field Compliance Reviews	8.0	13.0	13.0	0.0
FHEO Monitoring of CPD Programs	20.0	22.0	22.0	0.0
FHEO Monitoring of PIH/Housing Programs	26.9	31.9	31.9	0.0
Field Fair Housing Initiative Program - FHIP	30.8	43.6	43.6	0.0
Field Fair Housing Assistance Program - FHAP	16.1	20.0	20.0	0.0
Field Program Management and Administrative Support	77.0	77.0	77.0	0.0
Total	492.0	579.6	579.6	0.0

Detail of Fair Housing and Equal Opportunity Staff Requirements

		Fiscal Year 2002 Fiscal Year 2003			2003		Fiscal Year 2004					
		Projected Accomplish-	Projected Unit Cost		Underfunded Workload/	Projected Accomplish-	Projected Unit Cost		Underfunded Workload/	Projected Accomplish-	Projected Unit Cost	
Workload Guideline	Workload Indicator	ment	(Hrs)	FTE	Allocation	ment	(Hrs)	FTE	Allocation	ment	(Hrs)	FTE
Headquarters Employment (FHEO)												
Immediate Office of Assistant Secreta	=											
Provide Overall Guidance to FHEC				7.0								
E010 Activities in HQ and Field	NA			7.0				8.0		•••		8.0
FOACEHEO Bolious Brogram Evaluation	NIA			6.0				8.0				8.0
E010 FHEO Policy& Program Evaluation	INA			0.0				0.0				0.0
Economic Opportunity (Section 3 E010 Program)	NA			9.0				9.0				9.0
E010 Program)	INA			9.0				9.0				9.0
E010 Section 3 Compliance Review	NA			3.0				5.0				5.0
EUT Section 3 Compilance Review	INA			3.0				5.0				5.0
Departmental Equal Employment												
E010 Opportunity - Director's Office	NA			7.0				8.0				8.0
Eu II Opportunity - Director's Office	INA			7.0				0.0				0.0
Alternative Dispute Resolution												
E010 Program	NA			5.0				6.0				6.0
Lo fe i Togram	14/1			0.0				0.0				0.0
E010 Affirmative Employment Program	NA			4.0				4.0				4.0
EEO Counseling and Complaint	10.0			1.0				1.0				1.0
E010 Program	NA			14.0				14.0	2.0)		14.0
Subtotal				55.0				62.0				62.0
DAS for Enforcement & Programs												
Provide Guidance for												0.0
E050 Program Enforcement				3.0				3.0				3.0
Subtotal				3.0				3.0				3.0
Fair Housing Enforcement												
Provide Enforcement Management												
E100 and Oversight	NA			6.0				6.2				6.2
	Number of Cases											
E100 Conduct Complaint Investigations	Completed	80	44.20	1.7		128	44.20	2.7		128	44.20	2.7
	Number of Field											
Perform Field Office Monitoring	Office Reviews											
E100 and Oversight (Title VIII Program)	Completed	84	102.00	4.1		104	102.00	5.1		104	102.00	5.1
Provide Title VIII Technical												
E100 Assistance	NA			6.2				6.2				6.2
Develop Program Compliance and												
E100 Disability Rights Policy	NA		•••	5.3		•••	•••	5.3	3.0		•••	5.3
	Number of Requests											
B (B) B	for Technical											
Perform Disability Rights Technical	•	4.450	2.40	4 7		4.000	2.40	0.7		4 000	2.40	0.7
E100 Assistance and Reviews	Calls)	1,150	3.10	1.7		1,800	3.10	2.7		1,800	3.10	2.7

		Fiscal Year 2002			Fiscal Year 2003				Fiscal Year 2004			
Workload Guideline	Workload Indicator	Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE	Underfunded Workload/ Allocation	Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE	Underfunded Workload/ Allocation	Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE
Young Implementation Compliance		ment	(ПГS)	FIE	Allocation	mem	(піз)	FIE	Allocation	mem	(піз)	FIE
E100 Reviews	•			13.0				13.0				13.0
Young Implementation PHA												
E100 Support				2.0				2.0				2.0
Subtotal				40.0				43.2				43.2
Fair Housing Grant Programs												
E150 Immediate Office, Director				1.6				2.0				2.0
	Number of FHIP											
Administer FHIP Grants	Grant Applications											
E150 Management Process	Reviewed	197	48.57	4.6		285	48.57	6.6		285	48.57	6.6
Manage FHIP Grants Awards	Number of FHIP											
E150 Process	Grants Awarded	79	179.20	6.8		112	179.20	9.6		112	179.20	9.6
	Number of FHAP/SE											
E150 Manage FHAP/SE Grants Process	Grants	100	87.36	4.2		125	87.36	5.2		125	87.36	5.2
Manage Program Standards												
E150 Activities	NA		•••	7.0				8.0				8.0
Subtotal				24.2				31.4				31.4
Operations and Management Oversig	ht											
Provide Overall Management and Oversight for FHEO Operations												
E200 and Management	NA			5.0				5.0				5.0
	Number of FHEO											
E200 Perform FHEO Field Oversight	Field Offices	52	360.00	9.0		52	360.00	9.0		52	360.00	8.9
Provide FHEO System												
Development Administration and	Number of Staff											
E200 Technical Assistance	Supported	137	129.05	8.5		138	129.05	8.5		138	129.05	8.5
Perform FHEO Correspondence												
E200 Management	NA			3.2				3.2				3.2
Perform FHEO Information												
Technology Planning and Program												
E200 Management	NA			2.3				2.3				2.3
E200 Management & Planning, Director												
	Number of Staff											
Provide FHEO Human Resources	Supported (HQ											
E200 Management	&Field)	622	16.39	4.9		625	16.39	4.9		627	16.39	4.9
E200 Perform FHEO Budget Operations	NA	•••		4.4			•••	4.4				4.4
Provide FHEO Administrative Services and Operations												
E200 Management	NA			1.3				1.3				1.3
Subtotal	1473	•••		38.6		•••	•••	38.6		•••		38.5
Headquarters Employment Total				160.8				178.2				178.1
neauquarters Employment Total				100.0				170.2				170.1

Field Employment (FHEO)

FHEO Field Guidance and Direction

		1 130	Fiscal Year 2002			i i3cui i cui z	2003			Fiscal Year 2	-00-	
		Projected Accomplish-	Projected Unit Cost		Underfunded Workload/	Projected Accomplish-	Projected Unit Cost		Underfunded Workload/	Projected Accomplish-	Projected Unit Cost	
Workload Guideline	Workload Indicator	ment	(Hrs)	FTE	Allocation	ment	(Hrs)	FTE	Allocation	ment	(Hrs)	FTE
Drovide everall guidence and												
Provide overall guidance and E250 direction for Field FHEO activities	NA			42.0	3.0	1		45.0				45.
Subtotal	IVA	•••		42.0	5.0			45.0		•••		45.
FHEO Field Intake Processes				72.0				40.0				40.
THE OTHER MEDICAL PROCESSES	Number of inquiries											
Perform Field Fair Housing	entered into											
E250 Compliant Intake Activities	TEAPOTS	5,739	25.80	70.9		7,100	25.80	87.4	7.1	7,100	25.80	87.4
Subtotal		-,		70.9		,		87.4		,		87.4
Fair Housing Complaint Processing												
Conduct Field Title VIII	Number of											
E251 Investigations	Complaints closed	1,930	190.96	176.5		2,304	190.96	209.9		2,304	190.96	209.9
Investigate Concurrently-Field	Number of											
Complaints (Other Authority	Concurrent Field											
E251 Cases)	Complaints closed	781	63.51	23.8		985	63.51	29.8		985	63.51	29.8
Subtotal				200.3				239.7				239.
FHEO Field Compliance Reviews												
Desfere FUEO Field Occupies	Number of											
Perform FHEO Field Compliance	Compliance Reviews		445.04	0.0		407	445.04	12.0		407	445.04	10 (
E251 Reviews Subtotal	Completed	115	145.94	8.0 8.0		187	145.94	13.0 13.0		187	145.94	13.0 13. 0
FHEO Monitoring of CPD Programs				0.0				13.0				13.0
Perform FHEO Field Monitoring of	Number of CPD											
E252 CPD Programs	Grantees	1,008	41.39	20.0		1,115	41.39	22.0		1,115	41.39	22.0
Subtotal	Oranices	1,000	41.55	20.0		1,113	41.55	22.0		1,110	41.55	22.0
FHEO Monitoring of PIH/Housing Prog	grams											
Review Public Housing and	_											
Housing Programs for FHEO												
E252 Compliance	Number of PHA's	3,400	16.50	26.9		4,050	16.50	31.9		4,050	16.50	31.9
Subtotal				26.9				31.9				31.9
Field Fair Housing Initiative Program	- FHIP											
Perform FHIP Grant Management												
E253 in the Field	Grants	231	278.00	30.8		329	278.00	43.6		329	278.00	43.6
Subtotal				30.8				43.6				43.0
Field Fair Housing Assistance Progra												
Perform FHAP GTR/GTM Activities												
E253 in the Field	Grantees	92	365.00	16.1		115	365.00	20.0		115	365.00	20.0
Subtotal				16.1				20.0				20.0
Field Program Management and Admi Provide FHEO General Program	inistrative Support											
Management and Administrative E254 Support in the Field	NA			77.0				77.0				77.0
Subtotal	14/1	***		77.0 77.0		***	***	77.0 77.0		***		77.0 77. 0
Field Employment Total				492.0				579.6				579.0
i ioia Empioyment Total				-02.0				3, 5.0				0, 5.