

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
ADMINISTRATIVE SUPPORT OFFICES
OFFICE OF GENERAL COUNSEL**

The General Counsel is the chief legal officer of the Department and is the legal adviser to the Secretary and other principal staff of the Department. It is the responsibility of the General Counsel to provide legal opinions, advice, representation and services with respect to all programs and Departmental activities, as well as provide support regarding the development of the Department's programs and policies. The General Counsel is the head of the Departmental Enforcement Center (DEC), a non-attorney organization of financial and enforcement analysts, who enforce the Department's program requirements.

In addition to these traditional responsibilities of a federal office of general counsel, the Department of Housing and Urban Development's (HUD's) Office of General Counsel (OGC) performs many functions that protect Departmental resources, and generate revenues. In fiscal year 2012, OGC attorneys closed over \$18 billion worth of multifamily housing and healthcare facility loans that contributed to the collection of \$195 million in fees for the Financing Account of the Federal Housing Administration (FHA) General Insurance Fund. Approximately 25 percent of OGC's workforce is dedicated to closing loans for multifamily housing, healthcare facilities and 202 Supportive Housing Program for the Elderly and the Section 811 Supportive Housing Program.

Additionally, in fiscal year 2012, OGC attorneys completed the \$25 billion mortgage servicing settlement and obtained \$1.4 billion in recoveries for the FHA Fund. During fiscal year 2012, OGC's DEC generated more than \$1.8 million in FHA fund recoveries and more than \$47 million in multifamily housing project recoveries.

In fiscal year 2012, OGC attorneys have defended the Department's programs against almost \$600 million in litigation claims; provided legal support for over \$44 billion in Government National Mortgage Association (GNMA or Ginnie Mae) multiclass securities transactions; provided legal support for approximately 4000 Departmental procurement actions worth over \$4 billion; and issued 144 suspensions and 197 debarments of bad actors in HUD programs.

HUD's OGC consists of organizations in Headquarters, 10 Regional Offices of Counsel, 36 Field Offices of Counsel, and 5 DEC Satellite Offices. As of October 1, 2012, OGC had an on-board staff of 619 Full-time Equivalent (FTE) (317 FTE assigned to or out-stationed from Headquarters and 302 FTE assigned to the field offices). Of the 317 Headquarters FTE, 98 of those Headquarters positions are DEC positions that are physically located in Washington, D.C., New York, Chicago, Atlanta, Fort Worth and Los Angeles (the DEC staff that are located in the Satellite Offices are out-stationed Headquarters employees). Of the attorney positions, 157 FTE are located in Headquarters and the remaining 225 FTE are located in the 36 Field Offices of Counsel and 10 Regional Offices of Counsel. Since fiscal year 2008, OGC has consolidated legal operations and has closed legal operations in five field offices (Cincinnati, Columbia, Knoxville, Albuquerque and Sacramento). During this same period, the number of FTEs in OGC has decreased from 661 to 616, a decrease of over 6 percent.

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TOTAL - SALARIES AND EXPENSES				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	86,942	88,993	90,199	3,257
Non-Personnel Services				
Travel	1,040	1,223	718	(322)
Transportation of Things	9	75	20	11
Printing and Reproduction	891	1,098	998	107
Other Services	1,183	1,366	959	(224)
Training	479	409	619	140
Supplies	294	361	316	22
Claims and Indemnities	690	1,050	900	210
Non-Personnel Subtotal	4,586	5,582	4,530	(56)
GRAND TOTAL	91,528	94,575	94,729	3,201
Associated FTE	615	627	621	6

DESCRIPTION OF CHANGE FROM FY 2012 TO FY 2014

OGC requests \$94,729K in fiscal year 2014. This is an increase of \$3,201K from the funding requested in fiscal year 2012 and will result in an increase of 6 FTE from the fiscal year 2012 staffing level. Of this fiscal year 2014 funding request, \$90,199K is for Personnel Services which will fund 621 FTE. This fiscal year 2014 level assumes a .75 percent pay raise/Cost of Living Adjustment and funding for promotions/within grade increases.

BUDGET REQUEST BY FUNCTION

Management

The Management function includes the General Counsel and the immediate staff. The General Counsel is the chief legal officer in the HUD, serves as the Department’s designated ethics official, and oversees the DEC. OGC provides legal opinions, advice and services with respect to all departmental programs and activities. OGC represents the agency in litigation and enforcement actions; provides legal services in connection with the development, preparation and presentation of the Department's legislative initiatives; has primary responsibility for the development of HUD program regulations; and assists in the development of HUD programs and policies.

Management				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$986	\$1,000	\$1,017	\$31
Non-Personnel Services				
Travel	25	29	17	(8)
Other Services	2	2	2	-
Training	5	5	7	2
Supplies	2	2	2	-
Non-Personnel Subtotal	34	38	28	(6)
GRAND TOTAL	1,020	1,038	1,045	25
Associated FTE	7	7	7	-

FTE/Workload Summary & Summary of Changes

- 7 FTE will be used to perform program and policy support activities. This is the same FTE level as fiscal year 2012.

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Operations

The OGC Office of Operations provides the services required to support OGC and the accomplishment of its mission. The OGC Office of Operations provides management and legal support in the areas of field management, human resources, ethics, workload tracking and e-Discovery. Responsibilities include coordination and oversight of the 10 regional and 36 field offices and coordination and management of the e-Discovery obligations of the Department. The Office of Operations provides support services in the areas of field management, audits management, administration, human resources management, facilities management, correspondence control, training management, budget formulation, budget execution, procurement of goods and services, cash management, travel support and management, emergency response and procedures and information technology coordination and support. OGC manages the budget allocations for the entire Department’s printing in the Federal Register and payment of attorneys’ fees (claims and indemnifications).

Operations				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$3,382	\$3,429	\$3,489	\$107
Non-Personnel Services				
Travel	34	39	23	(11)
Transportation of Things	9	75	20	11
Printing and Reproduction	30	37	33	3
Other Services	1,000	1,170	814	(186)
Training	15	16	24	9
Supplies	149	183	164	15
Claims and Indemnities	690	1,050	900	210
Non-Personnel Subtotal	1,927	2,570	1,978	51
GRAND TOTAL	5,309	5,999	5,467	158
Associated FTE	24	24	24	-

FTE/Workload Summary & Summary of Changes

- 7 FTE will be used to provide budget, financial, and procurement support. This is the same FTE level as fiscal year 2012.
- 5 FTE will be used to provide administrative and human resources support for 620 OGC staff. This is the same FTE level as fiscal year 2012.
- 3 FTE will be used to provide Field legal operational guidance. This is the same FTE level as fiscal year 2012.
- 3 FTE will be used to provide Headquarters and Field electronic discovery oversight. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to provide Office of the Deputy General Counsel for Operations program and policy support. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to provide OGC Information Technology support. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to manage OGC correspondence. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide training support to OGC. This is the same FTE level as fiscal year 2012.

Multifamily

OGC Multifamily provides legal services in connection with statutory, regulatory and case law interpretation as well as advice concerning proposed policy, related to the origination and asset management of FHA-insured loans for multifamily projects, residential healthcare facilities and hospitals. OGC provides legal advice and guidance in connection with FHA mortgage insurance and conducts insured loan closings for Multifamily, 202 (elderly)/811 (disabled) and Office of Healthcare Programs (OHP) (healthcare including 232 loans using the LEAN) projects. OGC Multifamily provides legal advice and guidance on all aspects of asset management, conducts legal reviews of NOFA applications for 202/811 and mixed finance projects and reviews of pre-application packages for multifamily rental housing projects for legal sufficiency.

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Multifamily Housing				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$21,172	\$22,305	\$22,053	\$881
Non-Personnel Services				
Travel	347	424	249	(98)
Printing and Reproduction	5	6	5	-
Other Services	46	49	37	(9)
Training	181	99	151	(30)
Supplies	40	49	42	2
Non-Personnel Subtotal	619	627	484	(135)
GRAND TOTAL	21,791	22,932	22,537	746
Associated FTE	148	160	152	4

FTE/Workload Summary & Summary of Changes

- 107 FTE will be used to provide legal advice and conduct loan closing for multifamily and healthcare facilities. OGC projects that the multifamily and healthcare facilities loan closings will exceed \$18 billion in fiscal year 2014. This is a 2 FTE increase from the fiscal year 2012 level due to an increase of MF insurance issues from 1475 being accomplished in fiscal year 2012 to 1490 projected for fiscal year 2014.
- 17 FTE will be used to provide legal services regarding 1,340 "202/811" issues, including insured loan closings for this program. This is a 2 FTE increase from the fiscal year 2012 level due to an increase of "202/811" issues; 1,280 being accomplished in fiscal year 2012 to 1,340 projected for fiscal year 2014. In fiscal year 2012, OGC closed almost \$500 million in 202/811 insured loans.
- 13 FTE will be used to provide Multifamily insurance-related legal advice and counsel. This is the same staffing level as fiscal year 2012.
- 6 FTE will be used to provide supervisory, management, and administrative support to Regional Counsel. This is the same staffing level as fiscal year 2012.
- 5 FTE will be used to provide legal services for 35 Multifamily property disposition issues. This is the same FTE level as fiscal year 2012.
- 4 FTE will be used to provide legal services for 370 Section 8 issues. This is the same FTE level as fiscal year 2012.

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Single Family

OGC Single Family provides legal services in connection with statutory, regulatory and case law interpretation, as well as advice concerning proposed policy related to FHA’s single family mortgage programs and housing counseling functions. OGC also provides legal advice and guidance to the Single Family Homeownership Centers (HOCs) and to the Single Family Housing Asset Management’s Servicing and Loss Mitigation Division (more commonly known as the National Servicing Center (NSC) staff) with respect to underwriting, housing counseling programs, Real Estate Owned (REO) functions and in servicing FHA’s Secretary Held mortgage portfolio.

Legal support requests by HUD’s Office of Single Family Housing will also increase as new initiatives continue to be developed to address the impact of a large number of foreclosed homes and foreclosure prevention, such as assisting homeowners to refinance.

Single Family Housing				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$3,475	\$3,370	\$3,431	(\$44)
Non-Personnel Services				
Travel	18	20	12	(6)
Printing and Reproduction	1	1	1	-
Other Services	7	8	6	(1)
Training	16	16	24	8
Supplies	6	8	6	-
Non-Personnel Subtotal	48	53	49	1
GRAND TOTAL	3,523	3,423	3,480	(43)
Associated FTE	25	24	24	(1)

FTE/Workload Summary & Summary of Changes

- 14 FTE will be used to provide legal services regarding 2,575 Single Family Housing legal issues. This is the same staffing level as fiscal year 2012.

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- 9 FTE will be used to provide Single Family insurance-related legal advice and counsel. This is a 1 FTE decrease from the fiscal year 2012 level due to funding constraints.
- 1 FTE will be used to provide supervisory, management, and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

Ginnie Mae

OGC's Ginnie Mae/Finance Division provides legal support to Ginnie Mae in its guaranty of Mortgage-backed Securities (MBS). The Division provides legal advice on proposed policy and reviews and drafts proposed legislation and regulatory initiatives that may impact Ginnie Mae programs. Division attorneys also regularly draft issuer agreements, acknowledgement agreements, and risk mitigation agreements with participants in Ginnie Mae programs. The Division also works closely with the Department of Justice on Ginnie Mae related litigation. The Division provides oversight of legal services contractors that support Ginnie Mae, including review of legal documents for consistency with Ginnie Mae policy and avoidance of conflicts of interest. These functions are inherently governmental, or closely associated with the performance of inherently governmental functions. The Department anticipates that OGC resources will be increasingly called upon for review of proposed legislation and regulations arising from national policies that are developed for oversight of financial institutions, and their impact on Ginnie Mae and issuers of MBS. From 2007-2011, Ginnie Mae's volume has increased by more than 400 percent, from \$85 billion in fiscal year 2007 to \$350 billion in fiscal year 2011, and its market share of agency and non-agency mortgage-backed securities has risen from 5 percent to as high as 30 percent of the housing market. In fiscal year 2012, OGC attorneys provided legal support for over \$44 billion in multiclass secured transactions. Additionally, Ginnie Mae's total of outstanding guaranteed MBS now exceeds \$1 trillion, up from \$427 billion just prior to the financial crisis in 2008. While Ginnie Mae's staff has doubled, there has been only a 1 FTE increase in legal resources to support Ginnie Mae. The rapid changes have resulted in greater demands on OGC resources.

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Ginnie Mae				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$1,973	\$1,857	\$2,035	\$62
Non-Personnel Services				
Travel	14	16	10	(4)
Printing and Reproduction	-	1	1	1
Other Services	4	5	3	(1)
Training	9	9	14	5
Supplies	4	4	4	-
Non-Personnel Subtotal	31	35	32	1
GRAND TOTAL	2,004	1,892	2,067	63
Associated FTE	14	13	14	-

FTE/Workload Summary & Summary of Changes

- 14 FTE will be used to act as corporate counsel for GNMA. This is the same FTE level as fiscal year 2012.

Assisted Housing

OGC activities associated with this function are providing legal guidance and services in connection with the Office of Public and Indian Housing’s (PIH) management of the Public Housing program (including the formula grants under section 9), and all related public housing programs (i.e., Choice Neighborhoods, HOPE VI, and Moving-to-Work (MTW) programs); as well as PIH and the Office of Housing’s management of the Section 8 programs; and Housing’s management of the 202 Supportive Housing Program for the Elderly and the Section 811 Supportive Housing Program for Persons with Disabilities, and related programs (i.e., the Rental Assistance Demonstration program). Due to the increasing demands for affordable rental housing, OGC anticipates an increased demand for legal assistance to address emerging issues. OGC anticipates increased legal work to fully implement the Rental Assistance Demonstration program, and OGC will work with the Office of Housing to implement proposed regulations implementing the Melville Act and the Supportive Housing Act of 2010.

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Assisted Housing				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$4,135	\$3,998	\$4,216	\$81
Non-Personnel Services				
Travel	27	31	19	(8)
Printing and Reproduction	1	1	1	-
Other Services	9	10	7	(2)
Training	19	19	29	10
Supplies	8	10	8	-
Non-Personnel Subtotal	64	71	64	-
GRAND TOTAL	4,199	4,069	4,280	81
Associated FTE	29	28	29	-

FTE/Workload Summary & Summary of Changes

- 15 FTE will be used to provide legal services regarding 1,235 public housing issues. This is the same FTE level as fiscal year 2012.
- 13 FTE will be used to provide assisted housing legal advice and counsel. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel.

Community Planning & Development

OGC provides legal guidance and services in connection with the Office of Community Planning and Development’s (CPD) management of all its programs provided for community development to states, local governments, units of local government and non-profits. Programs include, but are not limited to, the Community Development Block Grant (CDBG) program, the HOME program, the Section 108 Loan Guarantee Program, the Neighborhood Stabilization programs, Insular Areas CDBG Program and the Brownfields Economic Development Initiative. In fiscal year 2013, Congress passed the largest CDBG appropriation for long-term disaster recovery to address the impacts of Hurricane Sandy. These long-term disaster recovery efforts will continue into fiscal year 2014 and require significant legal services.

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Community Planning & Development				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$2,490	\$2,569	\$2,617	\$127
Non-Personnel Services				
Travel	14	16	9	(5)
Printing and Reproduction	1	1	1	-
Other Services	5	6	4	(1)
Training	11	12	18	7
Supplies	5	5	5	-
Non-Personnel Subtotal	36	40	37	1
GRAND TOTAL	2,526	2,609	2,654	128
Associated FTE	18	18	18	-

FTE/Workload Summary & Summary of Changes

- 12 FTE will be used to provide community development legal advice and counsel. This is the same FTE level as fiscal year 2012.
- 5 FTE will be used to provide legal services regarding 935 CPD issues. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

Fair Housing

OGC provides all legal activities associated with the national administration and enforcement of, and compliance with, the Fair Housing Act and equal opportunity and civil rights laws in programs and activities assisted or conducted by the Department, including Title VI of the Civil Rights Act, Sections 109 and 111 of the Housing and Community Development Act, Sections 504 and 508 of the Rehabilitation Act, Title II of the Americans with Disabilities Act, the Age Discrimination Act, Section 3 of the Housing and Urban Development Act of 1968 and the Equal Credit Opportunity Act. OGC provides legal advice and counsel for all activities undertaken by the Office of Fair Housing and Equal Opportunity (FHCO), including the investigation of Fair Housing Act complaints of discrimination, compliance activities under other civil authorities, and the administration of the Fair Housing Initiatives Program (FHIP) and the Fair Housing Assistance Program (FHAP).

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Fair Housing				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$8,103	\$8,283	\$8,431	\$328
Non-Personnel Services				
Travel	65	75	44	(21)
Printing and Reproduction	2	2	2	-
Other Services	18	19	14	(4)
Training	37	38	58	21
Supplies	15	19	16	1
Non-Personnel Subtotal	137	153	134	(3)
GRAND TOTAL	8,240	8,436	8,565	325
Associated FTE	58	58	58	-

FTE/Workload Summary & Summary of Changes

- 36 FTE will be used to provide legal services regarding 1,655 civil rights issues. This is the same staffing level as fiscal year 2012.
- 9 FTE will be used to provide to enforce the Fair Housing Act. This is the same staffing level as fiscal year 2012.
- 8 FTE will be used to provide legal and compliance services to the Office of Fair Housing and Equal Opportunity. This is the same staffing level as fiscal year 2012.
- 3 FTE will be used to provide Fair Housing program and policy support. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same staffing level as fiscal year 2012.

Legislation & Regulations

The OGC Office of Legislation and Regulations provides legal advice to the entire Department on legislative and regulatory matters. The Office is responsible for the coordination, clearance and issuance of the Secretary’s legislative agenda and regulatory agenda. OGC provides legal and drafting assistance on legislation to help stabilize the housing market and increase employment opportunities. OGC plays a key role in regulatory reform. OGC makes recommendations and assists in removing regulations that are

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obsolete, outdated, or overly burdensome and implementing regulations that protect taxpayer funds, but also allow flexibility to grantees to the extent feasible.

Legislation & Regulations				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$2,114	\$2,143	\$2,181	\$67
Non-Personnel Services				
Travel	1	2	1	-
Printing and Reproduction	842	1,040	943	101
Other Services	5	5	4	(1)
Training	10	10	15	5
Supplies	3	4	4	1
Non-Personnel Subtotal	861	1,061	967	106
GRAND TOTAL	2,975	3,204	3,148	173
Associated FTE	15	15	15	-

FTE/Workload Summary & Summary of Changes

- 7 FTE will be used to coordinate the Department's regulatory agenda. This is the same FTE level as fiscal year 2012.
- 6 FTE will be used to provide legal counsel regarding legislation. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to provide legislation/regulation program and policy support. This is the same FTE level as fiscal year 2012.

Litigation

OGC provides all activities associated with the conduct of litigation to include, but not limited to, preparing answers to complaints, motions to dismiss and motions for summary judgment; issuing litigation holds; preparing of administrative records; propounding and responding to discovery, including document requests, interrogatories, requests for admission, expert reports and depositions; participating in hearings and trials; preparing appeals and petitions for certiorari; preparing requests to intervene and participating as *amicus curie*. OGC represents the Department in Federal and State Court litigation and responds to requests for Departmental documents or employee testimony when HUD is not a party to the litigation.

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Litigation				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$8,249	\$8,429	\$8,582	\$333
Non-Personnel Services				
Travel	96	110	65	(31)
Printing and Reproduction	2	2	2	-
Other Services	18	19	14	(4)
Training	37	39	59	22
Supplies	15	19	16	1
Non-Personnel Subtotal	168	189	156	(12)
GRAND TOTAL	8,417	8,618	8,738	321
Associated FTE	58	59	59	1

FTE/Workload Summary & Summary of Changes

- 35 FTE will be used to provide litigation support for 4,310 cases in the field offices. This is the same FTE level as fiscal year 2012.
- 11 FTE will be used to provide Insured Housing and Community Development litigation services. This is the same FTE level as fiscal year 2012.
- 6 FTE will be used to provide litigation legal and administrative support. This is the same FTE level as fiscal year 2012.
- 5 FTE will be used to provide Assisted Housing/Fair Housing litigation services. This is an increase of 1 FTE over the fiscal year 2012 staffing level to support increased litigation workload in this area.
- 2 FTE will be used to provide supervisory, management and administrative support to the Regional Counsel. This is the same FTE level as fiscal year 2012.

Ethics & Personnel Law

This function includes all activities associated with the Department’s ethics program and administrative appeals process to include, but not limited to, implementing the Department’s ethics program; operating a formalized and systematic process for managing and reviewing financial disclosure reports; providing customer service through advice and guidance to Department employees to ensure integrity in the Department’s decision-making processes and foster public confidence in Government; performing ethics program administration through reporting on program activities to the Office of Government Ethics; processing Secretarial and Deputy

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Secretarial Travel and non-Federal source travel; providing a comprehensive ethics training program; issuing Freedom of Information Act appeals decisions and drafting Secretarial decisions in administrative proceedings such as Fair Housing Act complaints of discrimination. Additionally, the attorneys provide legal personnel advice and represent the Department in administrative hearings and litigation filed before the Equal Employment Opportunity Commission (EEOC), the Merit Systems Protection Board (MSPB), the Federal Labor Relations Authority (FLRA), and the Office of Special Counsel (OSC). In fiscal year 2014, OGC anticipates an increase in requests for personnel legal advice related to Departmental initiatives to address down-sizing issues.

Ethics & Personnel Law				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$6,476	\$6,573	\$6,681	\$205
Non-Personnel Services				
Travel	162	187	109	(53)
Printing and Reproduction	2	2	2	-
Other Services	14	15	11	(3)
Training	29	30	46	17
Supplies	12	15	13	1
	219	249	181	(38)
GRAND TOTAL	6,695	6,822	6,862	167
Associated FTE	46	46	46	-

FTE/Workload Summary & Summary of Changes

- 16 FTE will be used to provide legal services regarding 439 personnel law cases. This is the same FTE level as fiscal year 2012.
- 11 FTE will be used to provide personnel law-related legal advice. This is the same FTE level as fiscal year 2012.
- 10 FTE will be used to provide ethics-related legal advice. This is the same FTE level as fiscal year 2012.
- 8 FTE will be used to provide legal services regarding 2,165 ethics law issues. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

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Procurement Law

OGC provides all legal activities associated with HUD’s processing of its procurement/contract functions including, but not limited to, providing legal advice; conducting legal reviews of pre-award activities and post-award activities; and handling resulting litigation. The Management and Marketing (M&M) and HUD Network (HUDNET) solicitations will require intensive use of resources and collaboration between the Office of the Chief Information Officer (OCIO), the Office of the Chief Procurement Officer (OCPO) and OGC to address the use of new technologies, cloud computing, data security issues, ownership of data rights and legal issues related to the transition from the current contracts to a new contract and technological environment. As HUD re-evaluates the Office of the Chief Information Officer (OCIO) portfolio and moves to consolidating procurements and finding cost-savings and efficiencies, the demand for legal services in the procurement of new and modified IT contracts has and will continue to increase.

Procurement Law				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Subtotal	\$2,053	\$2,083	\$2,118	\$65
Non-Personnel Services				
Travel	41	48	28	(13)
Printing and Reproduction	1	-	0	(1)
Other Services	5	5	4	(1)
Training	9	10	15	6
Supplies	4	5	4	-
Non-Personnel Subtotal	60	68	51	(9)
GRAND TOTAL	2,113	2,151	2,169	56
Associated FTE	15	15	15	-

FTE/Workload Summary & Summary of Changes

- 9 FTE will be used to provide legal services concerning contracts and grants. This is the same FTE level as fiscal year 2012.
- 5 FTE will be used to provide legal services regarding procurement/contracting issues. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

Program Enforcement

Program Enforcement develops and litigates enforcement actions against mortgagees and other program participants, both in-house and with the Department of Justice. During fiscal year 2012, OGC has recovered nearly \$1.4 billion in settlements and judgments relating to Housing’s mortgage insurance programs. This function includes enforcement of the Department's statutory, regulatory and contractual rights against those who participate in HUD programs, including a wide range of legal services in support of actions taken by the DEC, Multifamily Housing, Single Family Housing, PIH and CPD to enforce the Department’s statutory, regulatory and contractual rights against those who participate in HUD programs.

Program Enforcement				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$5,433	\$5,657	\$5,757	\$324
Non-Personnel Services				
Travel	42	48	28	(14)
Printing and Reproduction	1	1	1	-
Other Services	12	13	10	(2)
Training	24	26	39	15
Supplies	10	12	11	1
Non-Personnel Subtotal	89	100	89	-
GRAND TOTAL	5,522	5,757	5,846	324
Associated FTE	38	39	39	1

FTE/Workload Summary & Summary of Changes

- 17 FTE will be used to provide legal services regarding 1,221 enforcement issues. This is the same FTE level as fiscal year 2012.
- 12 FTE will be used to conduct administrative hearings. This is an increase of 1 FTE over the fiscal year 2012 level to support increased administrative actions taken against program participants.
- 7 FTE will be used to provide Program Enforcement legal representation and support. This is the same FTE level as fiscal year 2012.

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- 2 FTE will be used to provide Program Enforcement program and policy support. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

Departmental Enforcement Center

The DEC’s mission is to strengthen the oversight of HUD programs and operations through monitoring, oversight and enforcement so that programs operate efficiently, effectively and with the highest degree of fiscal integrity.

Departmental Enforcement Center				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$14,330	\$14,687	\$14,944	\$614
Non-Personnel Services				
Travel	127	146	86	(41)
Printing and Reproduction	3	4	4	1
Other Services	32	33	25	(7)
Training	65	68	102	37
Supplies	16	20	16	-
Non-Personnel Subtotal	243	271	233	(10)
GRAND TOTAL	14,573	14,958	15,177	604
Associated FTE	102	103	103	1

FTE/Workload Summary & Summary of Changes

- 51 FTE will be used to review and process 1,360 financial case referrals. This is the same FTE level as fiscal year 2012.
- 12 FTE will be used to review and process annual 2,130 financial statement cases. This is the same FTE level as fiscal year 2012.
- 9 FTE will be used to process notices and fact based cases. This is the same FTE level as fiscal year 2012.
- 6 FTE will be used to provide enforcement support to PIH. This is an increase of 1 FTE over the fiscal year 2012 level to support increased requests for enforcement assistance from PIH.
- 5 FTE will be used to perform special projects/general administrative functions. This is the same FTE level as fiscal year 2012.

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- 5 FTE will be used to provide DEC Satellite program policy and guidance. This is the same FTE level as fiscal year 2012.
- 4 FTE will be used to provide management and administrative support. This is the same FTE level as fiscal year 2012.
- 4 FTE will be used to manage the Departmental Enforcement Center. This is the same FTE level as fiscal year 2012.
- 3 FTE will be used to review and process 330 physical case referrals. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to provide enforcement support to CPD. This is the same FTE level as fiscal year 2012.
- 2 FTE will be used to support the processing of suspensions, debarments and limited denials of participation against program participants who violate fair housing laws. This is the same FTE level as fiscal year 2012.

Administrative Law

OGC provides legal advice and counsel associated with the Environmental Law, Historic Preservation, Davis-Bacon and related Acts, Fiscal Law, Freedom of Information Act, Privacy Act, Lead Hazard Control, Sustainability, Policy Development and Research and General Administrative Law. In fiscal year 2014, OGC anticipates an increased need for legal advice related to restructuring and reorganizations of the Department to address down-sizing issues; a major review of the Department’s delegations of authority in connection with changes in Departmental leadership as Administrations change and a greater need for legal support for fiscal issues as appropriations are limited and budgets are squeezed.

Administrative Law				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$2,133	\$2,165	\$2,210	\$77
Non-Personnel Services				
Travel	21	24	14	(7)
Printing and Reproduction	-	1	1	1
Other Services	5	6	4	(1)
Training	10	10	15	5
Supplies	4	5	4	-
Non-Personnel Subtotal	40	46	38	(2)
GRAND TOTAL	2,173	2,211	2,248	75
Associated FTE	15	15	15	-

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FTE/Workload Summary & Summary of Changes

- 9 FTE will be used to provide legal services concerning FOIA and administrative law. This is the same FTE level as fiscal year 2012.
- 5 FTE will be used to provide legal services regarding 700 administrative law issues. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

Native American Programs

All activities associated with providing legal guidance and services in connection with the Office of Public and Indian Housing’s management of programs for Native Americans including, but not limited, the Indian Housing Block Grant Program, the Section 184 Indian Home Loan Guarantee Program, the Indian Community Development Block Grant (CDBG) Program, and the Native Hawaiian Housing Program; and legal advice and counsel for Indian CDBG grants, Indian Housing Block Grants, Native Hawaiian Housing Block Grants, Recovery Act Programs, Section 184 and Section 184A.

Native American Programs				
(dollars in thousands)				
	FY 2012	FY 2013	FY 2014	FY 2012 to FY 2014
Personnel Services	\$438	\$445	\$437	(\$1)
Non-Personnel Services				
Travel	6	7	4	(2)
Other Services	1	1	1	-
Training	2	2	3	1
Supplies	1	1	1	-
Non-Personnel Subtotal	10	11	9	(1)
GRAND TOTAL	448	456	446	(2)
Associated FTE	3	3	3	-

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FTE/Workload Summary & Summary of Changes

- 1 FTE will be used to provide legal services regarding 175 Native American program issues. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide legal services regarding Native American programs. This is the same FTE level as fiscal year 2012.
- 1 FTE will be used to provide supervisory, management and administrative support to Regional Counsel. This is the same FTE level as fiscal year 2012.

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