



Audit Report

District Inspector General for Audit
Northwest/Alaska District

***OFFICE OF NATIVE AMERICAN
PROGRAMS
STAFF TRAINING CONFERENCE
RENO, NEVADA***

*2000-SE-107-0002
September 29, 2000*

U.S. Department of Housing and Urban Development
District Inspector General for Audit
Federal Office Building, Suite 125
909 First Avenue
Seattle, WA 98104-1000



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Audit Case Number	2000-SE-107-0002

MEMORANDUM FOR: Harold Lucas, Assistant Secretary for Public and Indian Housing

FROM: *Frank E. Baca*
Frank E. Baca, District Inspector General for Audit

SUBJECT: Final Report on Office of Native American Programs (ONAP)
Staff Training Conference, Reno, Nevada, December 6-9, 1999

This is the final report of our review of the ONAP Staff Training Conference held in Reno, Nevada, from December 6-9, 1999. This review was initiated based on a Senator's request to provide a report on any findings of concern related to a complaint the Senator received alleging the presentation of material that was derogatory toward Native Alaskans during the conference. Also, two other complaints were received by this office alleging unauthorized attendance, waste, misconduct, and offensive material at the conference. The purpose of our review was to determine if: (1) insensitive or offensive material was presented during skits performed at the conference; (2) an unauthorized individual attended the conference at government expense; (3) employee misconduct occurred during the conference, and (4) the conference was an effective or efficient use of government resources.

The results of the review show that (1) Alaska Office of Native American Programs management personnel were involved in the development and presentation of a skit that contained material that was at a minimum insensitive to Native Alaskans and was derogatory toward their culture, (2) Headquarters ONAP officials did not hold accountable for their actions those responsible for presenting offensive or insensitive material at the training conference and have not been proactive in oversight and management of Alaska ONAP, and (3) an unauthorized individual attended the conference at government expense because ONAP officials did not consider relevant travel laws and regulations. We were unable to substantiate any of the allegations of employee misconduct at the conference, in part because ONAP did not have good controls over attendance. Overall, the training conference overall appeared to be an efficient and effective use of government resources.

Within 60 days, please furnish this office, for each recommendation in this report, a status on: (1) corrective action taken; (2) the proposed corrective action and the date to be completed; or (3) why action is not considered necessary. Also, please furnish copies of any correspondence or directives issued related to this review.

If you have any questions please contact Robert Woodard, Assistant District Inspector General for Audit, or Terry Westhoff, Senior Auditor, at 206-220-5360.

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Executive Summary

We received three complaints regarding a staff training conference conducted by the Office of Native American Programs (ONAP) from December 6-9, 1999. One of the complaints alleging insensitive or offensive material was provided to us through a senatorial inquiry. The senator requested this office to provide a report along with any findings of concern. In response to the allegations in the three complaints, we conducted a review to determine if:

- insensitive or offensive material was presented during skits performed at the conference.
- an unauthorized individual attended the conference at government expense.
- employee misconduct occurred during the conference.
- the conference was not an effective or efficient use of government resources.

We concluded the skit was offensive and derogatory

Alaska Office of Native American Programs management personnel were involved in the development and presentation of a skit that contained material that was at a minimum insensitive to Native Alaskans and derogatory toward their culture.

In our opinion, the presentation of the skit was the result of current Alaska ONAP management personnel's lack of professional judgment, as well as a lack of skills in the areas of cultural sensitivity, human relations, communications, and diversity.

The Assistant Secretary for Public and Indian Housing needs to ensure that Alaska ONAP management personnel understand the seriousness of their actions and in the future follow HUD policies, regulations, and requirements with regard to insensitive and offensive material. To help achieve this, we are recommending that the Assistant Secretary (i) have the Alaska ONAP Administrator issue a public apology, (ii) require training courses for Alaska ONAP management and staff, and (iii) consider if disciplinary action against responsible parties is appropriate.

Persons responsible were not held accountable

Headquarters Office of Native American Programs officials did not hold those responsible for presenting offensive or insensitive material at the training conference accountable for their actions and have not been proactive in oversight and management of Alaska ONAP.

There was no accountability because Headquarters ONAP officials failed to recognize material that was insensitive or offensive that was presented at the training conference. Furthermore, Headquarters ONAP has not been proactive in addressing Equal Employment Opportunity (EEO) and work environment issues through their management practices.

We are recommending that the Assistant Secretary for Public and Indian Housing ensure that there will be no tolerance for insensitive or offensive actions or behavior in the workplace and work environment issues are made part of ONAP office reviews by:

- ensuring amendment of area ONAP office review guides to specifically include:
 1. compliance with EEO and Affirmative Employment regulations, policies, guidelines, and goals.
 2. measurement of office environment and morale.
- issuance of a memorandum stating there is zero tolerance for jokes, comments, or other material that is offensive or insensitive to any ethnicity, race, sex, disability, religion, color, or other class of people, and issue disciplinary guidelines for such actions.

Controls over attendance need improvement

An unauthorized individual attended the training conference at government expense because ONAP management officials failed to consider all relevant criteria before allowing the person to attend. Also, we found no evidence to support allegations of employee misconduct at the ONAP Staff Training Conference in part because ONAP did not have good controls over attendance. Overall, the training conference was an efficient and effective use of government resources.

We are recommending that the Assistant Secretary for Public and Indian Housing ensure adequate controls are in place over attendance at future organizational training events.

HUD agreed with the audit results

Draft findings were provided to the Assistant Secretary for Public and Indian Housing for written comments on August 25, 2000. We received the Assistant Secretary's response on September 26, 2000, and incorporated his comments into the report as appropriate. The Assistant Secretary stated in his comments that the Office of Native American Programs is ready to implement the recommendations made. The Assistant Secretary declined an exit conference.

We appreciate the cooperation of employees in the Anchorage (Alaska) HUD Office as well as officials in the Offices of Public and Indian Housing and Native American Programs in promptly complying with our requests for information.

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Abbreviations

CFR	Code of Federal Regulations
EEO	Equal Employment Opportunity
EEO/AE	Equal Employment Opportunity/Affirmative Employment
EPPES	Employee Performance Planning and Evaluation System
HUD	Department of Housing and Urban Development
NwONAP	HUD Northwest Office of Native American Programs
OIG	Office of Inspector General

Introduction

Complaint alleged misconduct and an inappropriate training site

This office received an anonymous complaint letter dated December 15, 1999. The complaint alleged that the person had just returned from an Office of Native American Programs (ONAP) training session at a casino in Reno, Nevada. The complainant stated it was a poor environment for a HUD training session. The complainant also provided examples of unprofessional conduct that had allegedly occurred during the training, including personnel gambling during training hours, ONAP-sponsored open bars, Skit Night, and personnel “hungover” from alcohol during the training sessions. The person added that Government resources should not have been expended for this type of event.

Another complaint alleged misuse of funds and an offensive Alaska ONAP skit

An anonymous telephone complainant stated that an unauthorized individual was allowed to attend the ONAP Staff Training Conference in Reno, Nevada. The complainant specifically alleged that a volunteer in Alaska ONAP was improperly authorized to attend at government expense. Additionally, the complainant alleged that a skit presented by Alaska ONAP management at the conference was offensive to Native Alaskans. A copy of the script and a videotape of the skit were mailed to our office.

Complaint to Senator Stevens alleged culturally insensitive material presented

Lastly, a letter of inquiry from United States Senator Ted Stevens, Alaska, dated April 7, 2000, was sent to Northwest/Alaska District Office of the Inspector General. The letter stated that the senator received a complaint from a person who wished to remain anonymous regarding “a videotape made of a HUD training session in Reno that may have been derogatory against Alaska Natives and American Indians and pokes fun at rural Alaskans with their outhouses and honey buckets.”

Senator Stevens requested that the Inspector General’s Office conduct a review and provide him a report along with any findings of concern.

ONAP staff training conference

ONAP held a Staff Training Conference from December 6-9, 1999, at the Atlantis Casino & Resort in Reno, Nevada. The primary purpose of this conference was to provide all ONAP

staff training on new processes and responsibilities with regard to a recent ONAP reorganization.

The training was presented to 167 participants that included the diversity of people and skills within ONAP. It was also expanded to include General Counsel staff that work with ONAP along with ONAP Administrators, Community Builders, Loan Guarantee Specialists, support staff, Grants Management, and Grants Evaluation personnel. The training sessions for ONAP employees included both plenary sessions, where all staff attended, and break-out sessions for each group of employees.

The first day of the training, December 6, 1999, was a workshop for Grants Evaluation Specialists. All staff attended training December 7-9, 1999. Travel back to regular duty stations took place primarily on December 10, 1999.

Review objectives and methodology

We reviewed the ONAP Training Conference to ascertain the validity of the complaints by determining if:

1. insensitive or offensive material was presented during the ONAP Staff Training Conference.
2. headquarters ONAP management officials took appropriate action to combat an environment of unfair treatment and held those responsible for the presentation of any insensitive material accountable for their actions.
3. there were unauthorized individuals attending the conference at government expense.
4. the training conference was in an appropriate location and was an efficient and effective use of government resources.
5. there were adequate controls to ensure personnel attended required training sessions.
6. there was any misconduct or unprofessional behavior by ONAP employees during the training conference and if there was accountability by management.

To achieve the review objectives we:

1. reviewed the complaints to identify issues being alleged.

2. reviewed the videotape to better understand the issues and who participated in the skit presentation.
3. interviewed all Alaska ONAP staff and judgmentally selected Seattle ONAP staff that attended the training conference to determine if:
 - those that viewed the Alaska ONAP skit felt it was insensitive and derogatory toward Native Alaskans.
 - any unauthorized individuals attended the ONAP Staff Training Conference.
 - the conference was at an appropriate location and the training was effective and efficient.
 - there was any employee misconduct.
4. interviewed a judgmentally selected group of other HUD employees, after having them view the skit script and videotape, to determine if they felt the skit was insensitive and derogatory toward Native Alaskans.
5. interviewed ONAP staff involved in the planning, coordination, and authorization of travel and training for the conference to determine if unauthorized individuals attended the conference, and if the site selection and conference were based on economic or effectiveness factors.
6. requested and reviewed all documentation provided related to planning, conducting, and post training information for the conference to determine if the training was an effective and efficient use of government resources.
7. interviewed contractor staff that participated in the training conference to determine if:
 - they were there to provide a direct service to the government.
 - they observed any misconduct by ONAP employees.

- the training conference was effectively and efficiently conducted.
8. reviewed information requested from and provided by ONAP Headquarters on any past complaints involving Alaska ONAP that went to at least the ONAP Headquarters level to determine what action was taken.
 9. interviewed Headquarters ONAP officials responsible for evaluation and management of area ONAP Administrators. Requested any documentation on past complaints of Alaska ONAP office with regard to any issues involving fair treatment of applicants, employees, or clients to determine if there is a pattern of similar issues involving Alaska ONAP management.

Our review covered the period December 6-9, 1999, and was extended as necessary to accomplish our objectives. We performed our field work from June to August 2000.

We conducted our review in accordance with generally accepted government auditing standards.

Alaska Office of Native American Programs management personnel were involved in the development and presentation of a skit that contained material that was at a minimum insensitive to Native Alaskans and derogatory toward their culture and way of life.

Racial or cultural insensitivity in HUD is not to be tolerated

The Department's position is clear that racial or cultural insensitivity and offensive material are not to be tolerated. This position permeates through several different governmental regulations, guidelines, and policies that are intended to guide government managers on issues of sensitivity and the appropriate treatment of both employees and those in the public that we serve. The following are a few of the of criteria that relate to this subject (*italics added for emphasis*):

The Code of Federal Regulations (24 CFR, Part 7), Paragraph 7.15 (c) states in part:

All managers and supervisors are responsible for encouraging and taking positive steps to ensure respect for and acceptance of minorities in the workforce.

The guidebook, Personnel Practices for Supervisors, issued by HUD Human Resources Department, Section VIII, Page 43, states in part to prevent discrimination you (supervisors) must:

- provide positive leadership and support for the Equal Employment Opportunity (EEO) Program;
- maintain relationships with all those supervised in a manner that fosters effective teamwork and high morale; and
- *promptly take or recommend appropriate action to overcome any impediment to the achievement of the objectives of the EEO Program.*

The guidebook, Personnel Practices for Supervisors, issued by HUD Human Resources Department, states in Section VIII, Page 44:

Supervisory actions that may cause complaints include: failure to communicate with subordinates in general and particularly about decisions affecting them; *not stepping back and examining how your behavior and actions are received.*

The Agreement Between HUD and the American Federation of Government Employees, Directive 314.0. states in Article 19.01:

Management will promote full realization of equal employment opportunity goals through a positive and continuing effort. *Such efforts shall include the eradication of offensive remarks in the workplace.*

The Federal Manager's Guide to EEO, published by FPMI Communications, Inc., states in Chapter 4, Page 56:

A manager should let everyone know you are opposed to discrimination and act like it. Try to keep their personal opinions on non-work issues to themselves. *Avoid assumptions about entire groups of people. Don't tell or condone jokes directed at any ethnic, racial, sexual, religious, or age group. Manager's involvement in or tolerance of such matters has been accepted by courts as evidence of discrimination or a discriminatory attitude.*

In addition, ONAP employees in supervisory or managerial positions have an element on their Employee Performance Planning and Evaluation System (EPPES) performance evaluation that measures their adherence and support of Equal Employment Opportunity/Affirmative Employment (EEO/AE) and cultural diversity within the organization.

Alaska ONAP management personnel were involved in developing and presenting a skit at the ONAP Staff Training Conference that was at least insensitive to Native Alaskans and was derogatory toward their culture and way of life.

Deputy Assistant Secretary
authorized "Skit Night"

The Deputy Assistant Secretary for Native American Programs authorized the scheduling of a "Skit Night" as an optional evening event for ONAP staff to attend. The idea was that "Skit Night" would be for team building, fun and entertainment. The event was scheduled for the evening of December 8, 1999. Headquarters ONAP asked area ONAP offices to participate and indicated to them that it was not mandatory for offices to present a skit or for staff to be present.

In response to the invitation to present skits, the Alaska ONAP Administrator informed ONAP Headquarters that Alaska ONAP would participate.

The Director of Grants Evaluation for Alaska ONAP volunteered to write and develop a skit for the office. He came up with a “Star Trek” parody titled “The Enigma.” The Director of Grants Evaluation sent the first draft to other Alaska ONAP management team members (Administrator, Director of Grants Management, and Senior Advisor). The Alaska ONAP Administrator said he edited out a particular name of an Alaskan Village Chief that was in the original skit. The skit was electronically mailed to Alaska ONAP staff to ask for their participation as actors in the skit.

The Skit Night was a scheduled event on the training conference agenda that took place in a conference room that was reserved by ONAP for training. The skits were performed on December 8, 1999, at the ONAP Staff Training Conference in Reno, Nevada. Those in attendance at the “Skit Night” event included the Deputy Assistant Secretary for Native American Programs, ONAP Administrators, Directors, Specialists, and support staff.

The Alaska ONAP Director of Grants Evaluation stated he believed the skit was videotaped for him by the Alaska ONAP Administrator’s son. The videotape included “The Enigma” skit and portions of other Skit Night events. On February 10, 2000, the Director of Grants Evaluation sent an office e-mail offering a copy of the videotape to the Alaska ONAP staff.

We received a copy of the original tape from the Director of Grants Evaluation and reviewed the videotape and script of the Alaska ONAP skit. The videotape we received from one of the complainants was a duplicate of the Director of Grants Evaluation’s original videotape.

Skit summary

The skit theme was that the Alaska ONAP staff were the crew of the “Starship NAHASDA.” The “starship” was apparently orbiting Earth when the crew saw many groups of “primitive” structures that were secluded in what they described as the “Northern quadrant.” One of the crew members stated that there appeared to be “no reason for the structures to be there.” ONAP sent a team down to Earth to investigate one of the villages and contact one of the Native villagers. The villager

they met appeared to be primarily interested in receiving government money and the ONAP crew were trying to understand the Native way of life and culture, in order to assist them. In this effort, the crew mistakenly thought that eating out of a village honey bucket¹ was a Native ritual. In the end ONAP was able to get emergency assistance for the Native people because of their living conditions.

Participants included Alaska ONAP management team

The videotape showed that the primary participants included the Alaska ONAP management team of the Administrator, Senior Advisor, Director of Grants Management, and Director of Grants Evaluation, who all were “actors” in the skit. The “Enigma Cast” sheet on the front of the script indicated that a Program Assistant in Grants Management and two Grants Evaluation Specialist also were “actors” in the skit. Two Grants Management Specialists also participated in narration and technical support for the skit.

Methodology for interviews conducted

We judgmentally selected three groups of individuals to determine their perceptions of the content of the skit material:

Alaska ONAP staff	13
Seattle ONAP staff	3
Non-ONAP HUD staff	11

Alaska ONAP staff interviews

We interviewed 13 of 17 Alaska ONAP staff members, including the 10 staff that attended the skit. All 10 were Caucasians. Nine of the 10 Alaska ONAP staff members interviewed participated in the skit and one non-participant attended the “Skit Night” events.

We judgmentally selected three of the seven remaining Alaska ONAP employees that indicated they had not attended or participated in the skit to independently view the videotape and the script of the skit. The three selected included two Native Americans and one African American. We selected these individuals in order to get a more diverse perspective from Alaska ONAP staff.

Eight of ten Caucasians felt the skit was appropriate

Eight of the ten Caucasians did not feel the skit was insensitive. Comments included the following:

¹ Honey bucket is a common term for a portable toilet.

- ⇒ Two stated that they could see where some of the content could be insensitive to Native Alaskans.
- ⇒ All ten stated that they believed there was no intent for the skit to be insensitive or offensive to Native Alaskans. They stated the skit was intended to be funny and at the same time show some of the unique challenges in rural Alaska.
- ⇒ None of the four management personnel thought the skit was insensitive and felt they were trying to educate other ONAP offices about the challenges they face in Alaska that are different from other areas.
- ⇒ Two stated that at least one person had stated during skit rehearsals that some of the information in the skit may border on being insensitive to Native Alaskans, but that management personnel did not acknowledge the person's comments. However, Alaska ONAP management personnel indicated they did not hear any employee state that they were concerned with the content of the skit.
- ⇒ One individual felt uneasy about participating in the skit, but felt that backing out of the skit would indicate to management that the person was not a team player.
- ⇒ Two Alaska ONAP management officials said that some work time was used to develop, prepare, and rehearse the skit.
- ⇒ One Alaska ONAP management official did not understand why the Inspector General's Office was inquiring into the Alaska ONAP skit. The person stated that the skit and the videotape were meant for after training hour's entertainment purposes of ONAP staff and not intended to get out to other offices or the public.

Minority staff found the skit offensive

The three Alaska ONAP minority staff that viewed the videotape and read the script of the skit felt it was offensive to Native Alaskans and derogatory toward their culture.

Comments from the three were as follows:

- ⇒ One individual stated that the honey bucket portion of the skit was offensive to Native Alaskans and the “Star Trek” theme that depicted Native Alaskans as alien-like beings was insensitive. It depicted Alaska ONAP crew as superior to the Native Alaskans. The person said it is particularly troubling in that these people serve the Native Alaskan community. The individual thought that the skit videotape and script would cause damage to HUD’s relations with the Native Alaskan community saw them.

- ⇒ Another ONAP individual stated that the skit was a joke at the expense of minorities. It appeared that Alaska ONAP is appalled by Native living conditions. It is not appropriate to make fun out of another culture, and the skit was degrading.

- ⇒ The third individual stated the skit was offensive and insensitive to Native Alaskans and their living conditions. The honey bucket portion was not funny as sewage is a serious problem in the Native Alaskan community. Children are getting sick with hepatitis and other diseases and the skit participants are making light of this.

Seattle ONAP interviews

Seattle ONAP staff attended the ONAP Training Conference and three individuals interviewed indicated that they were present for the Skit Night activities. We asked these individuals questions to determine their views on the sensitivity of the skit. Two individuals were Caucasian and the other was Native American.

None of the three individuals thought the skit was offensive. Two of the individuals also did not feel the skit was insensitive. The other did state the skit showed an ignorance of local Native customs.

Non-ONAP HUD interviews

We selected 11 non-ONAP HUD employees in the Anchorage, Alaska, and Seattle, Washington offices, to review the videotape and script of the Alaska ONAP skit to determine their perceptions of the Alaska ONAP skit. These people were judgmentally selected to represent a diverse group that included:

- Four Native Americans/Native Alaskans
- Two African Americans
- One Hispanic American
- Four Caucasian women

The non-ONAP HUD employees selected included managers, professionals, specialists, and support personnel.

- All 11 thought the skit was derogatory, in whole or in part, toward Native Alaskans and their culture.
- All four Native individuals found the skit offensive to Native culture and the conditions in which Native Alaskans live. They commented that:
 - ⇒ The skit was disgusting and made fun out of Native American living conditions. It was a waste of government time and money.
 - ⇒ The individuals responsible for the skit appear to think Native Alaskan lives are not good enough, and that our civilization is not seen as civilization at all. The honey bucket portion was horrible. They are saying our people are dirty and unclean.
 - ⇒ Alaska ONAP is making fun out of rural Native living conditions. The skit shows no respect for Natives or their culture and is patronizing. It is troubling that these people are responsible for assisting the Native community.
 - ⇒ The skit was offensive to the situation of Native Alaskans. The problem is that Alaska ONAP administration does not recognize it. They are patronizing toward Native Alaskans and have a “those poor people” attitude. Most Native Alaskans don’t feel that way about their culture and heritage. ONAP management needs sensitivity training.
- One of the African American non-ONAP HUD employees stated the skit was offensive and that management should have known better than to do something like this. The person stated it shows a lack of human relations training and a lack of ability to communicate with minorities to understand what is offensive behavior.

- The other African American individual stated that the skit portrayed Native Americans in a very negative light. The skit was inconsiderate and in bad taste. It poked fun at the problem of raw sewage and indicated Natives were incapable of maintaining finances.
- The Hispanic American individual interviewed could see where the skit, especially the honey bucket portion, would be offensive to Native Alaskans.
- The four Caucasian females all described the skit as offensive or insensitive. Comments included:
 - ⇒ The skit was not very favorable toward Native Alaskans. The parts about primitive structures and there being no apparent reason for the settlements was improper. It showed a lack of respect for Native ways and was offensive. It is my gut feeling that Alaska ONAP does not like NAHASDA.
 - ⇒ The skit was crude, insensitive, and in bad taste. It was insensitive to the people that ONAP works with.
 - ⇒ It was a poor decision to put on such a skit and it was clearly insensitive to Native Alaskans and their culture.
 - ⇒ It is clear that Alaska ONAP managers do not like NAHASDA. They intended to be humorous, but it did not come across that way. It showed ignorance. Particularly offensive were that it showed Alaska villagers as basically from another planet, and the part of the honey buckets being a time honored tradition.

Overall results of the interviews

The results of our interviews of the three groups showed that, outside the Alaska ONAP participants, a clear majority (15 of 18) of those interviewed found the skit to be derogatory, insensitive, ignorant of, and/or offensive toward Native Alaskans. Overall, 17 of the 27 interviewed perceived at least insensitivity or ignorance toward Native Alaskans and their culture and/or customs:

- ⇒ Seven out of 16 Caucasians at least perceived the skit could be insensitive to Native Alaskans.

- ⇒ Six out of seven Native people found the skit offensive, including the three Native Alaskans that viewed it.
- ⇒ All three African Americans found the skit offensive or derogatory.
- ⇒ The one Hispanic American viewer perceived the skit offensive to Native Alaskans.

The skit was clearly insensitive to Native Alaskans

Although the numbers of the three groups combined support a conclusion that the skit was at least insensitive, we believe the critical viewpoints are those of the Native peoples. Simply put, Native people were the subject of the skit and six out of seven Natives interviewed found the skit *offensive*. This combined with other racial minority views of the skit make it clear that the skit was at least insensitive and could more accurately be described as offensive.

In considering the disparity between the Alaska ONAP participants views and those of other viewers, we believe that Alaska ONAP staff may have been clouded by the intent of the skit. It appears that Alaska ONAP skit participants did not intend to be insensitive or offensive. However, in a review of this complaint we are not making a conclusion of what was intended by the skit, but rather if the end result was that the skit was insensitive. In trying to convey to their audience problems and challenges Alaska ONAP faces in the unique environment of Alaska, Alaska ONAP management failed to appropriately consider sensitivity and respect for the Native Alaskan community.

Alaska ONAP showed lack of judgment and sensitivity in not consulting Native American staff

Alaska ONAP Administrator had a source of Native American and Alaskan people in the Alaska HUD office. However, based on our interviews with Alaska ONAP managers and Native American staff, no effort was made to consult them about the content of the skit. This failure to communicate with the Native staff clearly showed a lack of basic cultural awareness and sensitivity.

The Alaska ONAP Administrator said he edited the skit, and removed from the skit a specific name of a Native Alaskan chief. This would appear to be an attempt not to offend a particular individual. However, it seems that the Alaska ONAP Administrator and the other Alaska ONAP management team members missed the big picture of the effect of the skit on the

entire Native Alaskan community and the pride in their heritage and culture. The fact that the skit was presented at a hotel conference and videotaped displayed a lack of foresight and consideration of public perception should the skit or videotape be viewed by those outside ONAP.

Insensitivity and other problems may exist on a broader level within Alaska ONAP

During interviews with Alaska ONAP staff, they provided information which indicates the skit may be part of a broader problem of insensitivity, preferential treatment, disrespect, and miscommunication between the ONAP management team and their staff. Of the 13 non-management/supervisory staff interviewed, 10 out of 13 stated that they believe that managers in the Alaska ONAP lack managerial skills such as communication, human relations, and mutual respect for employees. Furthermore, 8 out of 13 perceive that managers and/or supervisors practice preferential treatment or discrimination.

We believe that the performance of this skit had the following impacts on HUD:

- (1) It reinforced an environment in Alaska ONAP where insensitive or offensive material may be seen as tolerable. This can best be portrayed in the fact that during the time the Office of Inspector General (OIG) auditors were at Alaska ONAP in June 2000, someone put a comic strip on a minority employee's desk that was perceived as an attack on the individual's character. This was done after the employee that received the comic strip was interviewed by OIG auditors. The Alaska ONAP Administrator put out an e-mail message to staff stating that this type of behavior would not be tolerated and that the person responsible may face disciplinary action. However, no follow-up action was taken to determine who was responsible.
- (2) The videotape and/or script of the Alaska ONAP skit, if seen by the public, could adversely affect the confidence of the public in the integrity and objectivity of the federal government. This is clearly displayed in the responses to the skit by those that viewed the script and videotape outside ONAP.
- (3) Based on the reaction to the skit by Native Alaskan viewers, the skit could measurably damage relations between HUD and the Native Alaskan community.

Why did this occur?

In our opinion, the presentation of this skit was the result of current Alaska ONAP management's lack of professional judgment and sensitivity in administering a diverse workforce and public they serve. Attitudes and skills that need to be developed or refined include cultural sensitivity, human relations, communications, and diversity leadership.

We reviewed training provided to those in Alaska ONAP leadership positions in the past five years to determine if this might be a factor in the lack of sound judgment and sensitivity displayed toward Alaskan Natives (see Appendix B).

Cultural Sensitivity training was provided to the administrator and directors in 1996. A communications course was taken by the Grants Management Team Leader and Director of Grants Evaluation.

The review of training indicates that training in the areas of cultural sensitivity, EEO, communications, and human relations may be beneficial for the following reasons:

- Team Leader positions were filled in June 2000, and these individuals have not had the opportunity to attend this type of training, particularly from a leadership perspective.
- The administrator and directors have had cultural sensitivity training, but it was four years ago.
- Alaska ONAP will soon be getting a new director in Grants Evaluation, as the incumbent had accepted a Community Builder position.

Conclusion

The most reliable benchmark as to the insensitive or offensive nature of this skit lies with the Native American and Native Alaskan community. This is especially true in that the skit was performed by a section of HUD whose mission is to serve the Native American community. Through the Native Alaskan and American reaction, we determined that Alaska ONAP management was at least insensitive to Native Alaskans.

Alaska ONAP management displayed poor judgment in performing this skit. The comment by one of the management officials on the intent of the skit staying in ONAP also represents a serious lack of judgment. Government employees

are public servants and have to consider that everything we do is subject to public scrutiny. This mindset is critical for all government employees in order to meet the goal of restoration of public trust.

A framed statement on the wall of Alaska ONAP reads:

Native Alaskans are not an interruption of our business, but the purpose of it. That Native Alaskans were not an outsider, but a part of our business; and, if it were not for Native Alaskans, there would be no reason for our work.

The skit appears to be, in many ways, contradictory to the proclamation on their wall. The Native Alaskans were shown to be almost an alien civilization, and not a part of ONAP's business. The skit appeared to pity the Native Alaskan culture and way of life. The mere title of the skit, "The Enigma," appeared to indicate either a lack of understanding or lack of respect for Native Alaskan village life by Alaska ONAP management personnel.

Auditee comments

The Assistant Secretary of Public and Indian Housing agreed that any appearance of racial or cultural insensitivity at HUD will not be tolerated. The Assistant Secretary stated that the Office of Native American Programs is ready to implement the recommendations in the report.

Recommendations:

We recommend that the Assistant Secretary for Public and Indian Housing:

- 1A. Direct the Alaska ONAP Administrator to issue a public apology.
- 1B. Require the individuals in Alaska ONAP at the GS-13, or equivalent level, and above to attend intensive cultural sensitivity, EEO, communications, human relations, and diversity leadership courses. A training continuum should also be developed to ensure managers attend such training at regular intervals.
- 1C. Require all Alaska ONAP staff to attend a cultural sensitivity and EEO course.
- 1D. Review this matter and consider if disciplinary action against those that presented insensitive jokes and material at the ONAP Training Conference, is appropriate.

Headquarters Office of Native American Programs (ONAP) officials did not hold accountable for their actions those responsible for presenting offensive or insensitive material at the ONAP Staff Training, and have not been proactive in oversight and management of Alaska ONAP.

Managers need to be able to recognize and address incidents that negatively affect its employees and work environment

The department's position is clear that racial or cultural insensitivity and offensive material are not to be tolerated. It is also clear that it is management's primary responsibility to ensure a workplace free from discrimination, insensitivity, hostility, and other barriers to a positive work environment and equal opportunity for all employees:

The Code of Federal Regulations (24 CFR, Part 7), Paragraph 7.15 (b)(f) states in part:

All managers and supervisors are responsible for:

- Evaluating subordinate managers on their performance of Equal Employment Opportunity/Affirmative Employment (EEO/AE) responsibilities; and
- being proactive in addressing EEO/AE issues through sound management and personnel practices.

The guidebook, Personnel Practices for Supervisors, issued by HUD Human Resources Department, Section VIII, Page 43, states in part:

To prevent discrimination you (supervisors) must:

- provide positive leadership and support for the EEO Program;
- maintain relationships with all those supervised in a manner that fosters effective teamwork and high morale; and
- promptly take or recommend appropriate action to overcome any impediment to the achievement of the objectives of the EEO Program.

The Agreement Between HUD and the American Federation of Government Employees, Directive 314.0, states in Article 19.01 (emphasis added):

Management will promote full realization of equal employment opportunity goals through a positive and *continuing effort*. Such efforts shall include the eradication of offensive remarks in the workplace.

The Federal Manager's Guide to EEO, published by FPMI Communications, Inc., states in Chapter 4, Page 57:

- A manager should let everyone know you are opposed to discrimination and act like it.
- Try to keep their personal opinions on non-work issues to themselves.
- Avoid assumptions about entire groups of people.
- Don't tell or condone jokes directed at any ethnic, racial, sexual, religious, or age group.
- Manager's involvement in or tolerance of such matters has been accepted by courts as evidence of discrimination or a discriminatory attitude.

Managers need to be proactive with sound management and personnel practices

The Deputy Assistant Secretary for Native American Programs did not hold those that presented insensitive or offensive material at the ONAP Staff Training Conference accountable for their actions.

We determined that the Deputy Assistant Secretary for Native American Programs did not:

- recognize material that might be insensitive or offensive.
- take appropriate action when determining that employees were offended by subordinate administrators' actions.
- monitor area ONAP offices on work environment issues.

The Deputy Assistant Secretary for Native American Programs was present at the ONAP Staff Training Conference

Skit Night activities while Alaska ONAP presented their skit, “The Enigma.” Also, present were ONAP Administrators, Directors, and other staff.

The Alaska ONAP Administrator said that no action was taken against him or any of his staff by the Deputy Assistant Secretary for Native American Programs, in response to the presentation of the skit at the training conference. The Alaska ONAP Administrator stated that the Deputy Assistant Secretary did inform him that they would have no more skits at ONAP events.

The Deputy Assistant Secretary said she was present during the Alaska ONAP skit, but was not paying close attention to the skit presentation, and therefore would not respond to questions about the sensitivity of the skit.

The Deputy Assistant Secretary provided us with a copy of an e-mail complaint, sent to her on February 24, 2000, about the Alaska ONAP skit. The Deputy Assistant Secretary responded to the complainant stating that she felt Alaska ONAP was not trying to be offensive and was trying to use humor to enlighten the audience about a serious situation. The Deputy Assistant Secretary also told the complainant that the complainant should focus on educating those that they perceive offended them in order to make them our (Native Americans) advocates.

Offensive joke told

The Deputy Assistant Secretary received and provided us a second complaint in reference to an acting Administrator in ONAP telling a joke at the training conference that the complainant felt was offensive to Native Americans. The joke, also provided to us by the acting Administrator who confirmed he told the joke, began with an intoxicated individual being stopped by a tribal police officer.

The complainant felt that this clearly portrayed that the drunk was a Native American. The complainant stated alcoholism in Native American country is a serious problem and described the reference in the joke as “disgusting, insensitive, and shameful.” The complainant was also upset that no other staff, including the Deputy Assistant Secretary, picked up on the inference and asked that the insensitivity be addressed quickly.

In response, the Deputy Assistant Secretary told the complainant she would handle it. The acting Administrator that told the joke informed us that he did apologize to the complainant. However, we determined that the apology did not take place until June or July 2000, at least six months after the incident. The complainant indicated he had almost forgot about the incident when the apology was received. This timing indicates the Deputy Assistant Secretary did not follow up with the acting Administrator to ensure the response to the offended individual was timely.

Many Alaska ONAP employees express frustration

During interviews of Alaska ONAP employees, many expressed their frustration about management and morale problems that they characterized as being persistent for numerous years in Alaska ONAP. Some employees referred to a survey conducted by the Northwest/Alaska District Secretary's Representative that began in November 1996.

The employees stated that they did not believe that any follow-up was done as a result of the survey. Some employees indicated they were skeptical because of past history that no matter what Office of Inspector General (OIG) determined in our review, no action would result.

Secretary's Representative survey

The Northwest/Alaska District Secretary's Representative conducted a survey of the Alaska HUD office in November 1996. A copy of the results of the survey and a follow-up visit in February 1997 by the Secretary's Representative were sent to the Acting Assistant Secretary for Public and Indian Housing on March 7, 1997. The Secretary's Representative informed the Acting Assistant Secretary of his concerns involving Alaska ONAP administration that were similar to those we noted during our interviews of Alaska ONAP employees.

The Secretary Representative recommended that the Assistant Secretary for Public and Indian Housing conduct an on-site review and a survey of staff.

No action taken by Acting Assistant Secretary for Public

The Northwest/Alaska District Secretary's Representative office and Alaska ONAP employees were not aware of any follow-up action conducted by any office to further review the concerns noted by the survey. The individuals in the Office of Public and Indian Housing that would have been responsible for responding to these issues are no longer with the department. As such, we are unable to determine if any actions or

discussions within the Office of Public and Indian Housing occurred with regard to Secretary's Representative's survey.

However, the current Alaska ONAP Administrator and two Alaska ONAP directors were in similar management or supervisory positions in Alaska ONAP during the time of the Secretary's Representative's survey. Given the comments provided by Alaska ONAP staff and the results of the survey, we contacted Headquarters ONAP officials responsible for the oversight and evaluation of area ONAP offices and their administrators to determine results of any past reviews conducted by their office. The person primarily responsible was the ONAP Director of Field Operations. He stated that, to his knowledge, Headquarters ONAP has never conducted a review of the Alaska ONAP office.

The ONAP Director of Field Operations is planning to conduct reviews of administration and operations of all area ONAP offices every two years. The first review was being conducted at the time of our fieldwork in the Chicago ONAP office. A review of Alaska ONAP is planned for 2001.

Planned reviews do not include work environment or fair treatment issues

The objectives of the most updated review guide planned for use in the reviews of the ONAP offices do not specifically include ensuring that EEO/AE regulations, policies, and goals are being met by management nor office environment/morale issues. Furthermore, although some procedural steps in the guide may indirectly uncover instances of unfair treatment or other similar problems, the guide does not have specific steps that are intended to review all such instances.

The ONAP Director of Field Operations, who is the evaluator for ONAP field office administrator said it was difficult to measure the EEO/AE and cultural diversity element of the Employee Performance Planning and Evaluation System (EPPES) evaluation, since he is in Washington D.C. and cannot see administrators' day-to-day interactions with staff.

Timely and appropriate action could have prevented Senatorial and potential public inquiry

The "skit incident" became the subject of Senatorial inquiry at least part because the Deputy Assistant Secretary for Native American Programs did not make administrators accountable for presentation of material that was offensive or insensitive, nor communicate to staff a lack of tolerance for such behavior. The actions taken in response to the incident were not appropriate,

and actions that were taken were not followed up on to ensure they were done in a timely manner.

Headquarters ONAP was not proactive in addressing EEO/AE issues through their management practices. Not performing periodic reviews of administration relative to such issues has also resulted in a lack of accountability. Review of such issues will communicate to staff that management takes fair treatment, EEO, and other work environment issues seriously.

Conclusion

The Deputy Assistant Secretary did not take adequate action. People in leadership positions in ONAP were involved in presenting a culturally insensitive skit and telling an offensive joke. Both of these were directed at the Native people that ONAP serves and were done in front of ONAP staff.

Although there may have been only two complainants, many more staff observed the skit and the joke, and may have drawn conclusions about what is considered appropriate standards of conduct in ONAP. The failure to take any action is not in keeping with HUD's policy for such behavior in the workplace. This was an opportunity for Headquarters ONAP management to communicate to all staff that telling race-related jokes or making light of another culture's values or way of life are not appropriate.

It is also our opinion that the "Skit Night," although conducted in the evening and optional, was clearly done in a workplace environment. It was an ONAP event that was on the training conference schedule and agenda. The skits were conducted in conference rooms reserved for the training conference and had personnel in leadership positions both attending and participating in the event. Any presentation of such material in such an environment equates to the office environment.

The Deputy Assistant Secretary's comments to the person that complained about the skit to focus on educating those that offend them, although well intended, were not appropriate. It is not the responsibility of an employee to educate their manager about insensitive and offensive behavior as was suggested. The chain of command is responsible for ensuring that a manager is aware that their conduct may have been inappropriate, reinforce this with all staff, and provide appropriate training.

The EEO and other employee environment and morale issues are vital in assessing the effectiveness of the administration and operations within an office. This is especially true in ONAP where administrations work with diverse populations both in the office and in the public. Insensitive material or behavior can not be tolerated in ONAP because of the vital importance of maintaining a positive relationship with the Native American community and because of the diversity within its work force.

Auditee comments

The Assistant Secretary agreed that if one person is offended then actions need to be taken to ensure the problem is correct. The Assistant Secretary reinforced in his comments that he knows that the Office of Native American Programs believes in the programs it administers and has tremendous regard for the Native Americans they serve and work with everyday. He added that the Office of Native American Programs is ready to implement the recommendations in the report.

Recommendations:

We recommend that the Assistant Secretary for Public and Indian Housing:

- 2A. Amend area ONAP office review guides to specifically include compliance with EEO/AE regulations, policies, guidance, and goals and a measurement of office environment and morale.
- 2B. Issue a memorandum stating there is zero tolerance and disciplinary guidelines for jokes, comments, or other material that is offensive or insensitive to any ethnicity, race, sex, disability, religion, color or other class of people.

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An unauthorized individual attended the Office of Native American Programs (ONAP) Staff Training Conference at government expense because ONAP officials did not consider relevant travel laws and regulations.

We did not find any evidence to support allegations of misconduct by employees during the conference, in part because ONAP did not have good controls over attendance.

Overall the ONAP Staff Training Conference appeared to be effective and efficient.

Volunteer Travel

Federal guidance for travel expenses

Authorizing a volunteer to travel at government expense is not in accordance with United States Code. Managers must be mindful of applicable laws and regulations prior to making decisions, especially those that they are not confronted with on a regular basis. 31 USC, Section 1345, *Expenses of Meetings*, only allows meeting expenses for government officials and employees on official duty:

An appropriation may not be used for travel, transportation, and subsistence expenses for a meeting. This section does not prohibit (1) an agency from paying the expenses of an officer or employee of the United States Government carrying out an official duty.

In *Invitational Travel*, paragraph C2 (b)(2) of Chapter 4 of *Principles of Federal Appropriation Law*, the General Accounting Office allows that an agency may invite a private individual to a meeting or conference at government expense only if that individual is legitimately performing a direct service for the government, such as making a presentation or advising in an area of expertise.

United States Comptroller General Decisions, 60 Comptroller General 456; 1981 United States Comptroller General, states in part:

As to the possible application of 5 USC 5703, that statute provides Federal agencies generally with authority to pay the travel expenses of a person serving the government without pay. Application of the statute is limited to persons who may properly be regarded as experts,

consultants, witnesses, attendants, or other advisors or aides, when they are called away from their homes at the request of an agency to perform a *direct service* for the government. (emphasis added)

ONAP approves volunteer travel

Alaska ONAP Senior Advisor asked Headquarters if their volunteer, who performs various duties for ONAP, could attend the Training Conference in Reno, Nevada. The Alaska ONAP Administrator was aware of the volunteer's attendance, and the Deputy Assistant Secretary for Native American Programs verbally approved the volunteer's travel and attendance at the training conference. The volunteer's travel orders were submitted with the rest of the Alaska ONAP staff and all were signed by the Headquarters ONAP Director of Field Operations.

Total travel costs for the volunteer came to \$1,468.66.

The ONAP Training Coordinator used Section 301-71.101 of the Federal Travel Regulation as the authority for allowing the volunteer to travel. This section states the person authorizing travel must consider if travel is necessary to accomplish the purpose of the government effectively and economically. The coordinator stated that the Deputy Assistant Secretary for Native American Programs felt it was necessary for all ONAP staff to be at the training.

Volunteer's travel should not have been approved

Interviews of Alaska ONAP management personnel and the volunteer indicated the volunteer did not attend the conference as an expert, consultant, advisor, or aide. The volunteer attended to receive support training and meet people from other ONAP offices. No direct service to the government was provided by the volunteer, and a review of training materials confirmed the volunteer did not present any training or provide any expert assistance.

As a result, \$1,468.66 was improperly expended. This occurred because ONAP officials did not consider all relevant laws and regulations when determining if it was proper for the volunteer to travel at government expense.

Conclusion

The volunteer in Alaska ONAP is considered a valued asset in their office. The volunteer assists ONAP employees in many ways and is considered very dependable. The person also is

reported to have computer skills that allow the office to function more efficiently. However, despite efforts to reward the volunteer for hard work and the perception of Headquarters officials that it was necessary for the volunteer to attend, it was an improper decision to authorize the volunteer to attend the conference at government expense. ONAP officials probably do not get requests for volunteers to travel at government expense on a regular basis and should have taken extra precautions to research laws and regulations to ensure they were acting in accordance with requirements.

Employee Conduct

Employees must maintain public trust and comply with standards of conduct

HUD employees must keep in mind that they are public servants and that the public expects high standards of ethical conduct and for government employees to act responsibly and safeguard resources. Employees at training conferences outside government facilities are in the public spotlight and any misconduct can cause damage to public trust in the government.

A letter, signed by HUD Secretary Andrew Cuomo, dated June 1997, used as a preamble to the HUD Ethics Policy states in part:

As you know one of my top priorities as Secretary of HUD is to restore the public's trust in the department. . . .The (ethics) rules as set forth are recognized as minimum standards of federal government employees.

5 CFR, 2635.101 states in part:

Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or ethical standards.

All but a few employees indicated no misconduct occurred

In our interviews of ONAP employees in the Anchorage, Alaska, and Seattle, Washington, we asked if they were aware of any conduct by employees or anything else they perceived as unprofessional or unethical. Two employees stated they saw unprofessional conduct by employees. Specifically, employees gambling during the time they were required to be in training. However, there was no evidence to support these allegations.

All others interviewed stated they saw no misconduct by ONAP employees. This included no gambling or employees under the influence of alcohol during training. Interviews from contractors that either supported or presented training at the conference also indicated that they were not aware of any unprofessional or unethical conduct by ONAP employees.

No attendance controls for training sessions

It was clear from the interviews that no sign-in sheets or other measures were used during the training conference to control time and attendance at sessions. All management and staff interviewed either indicated that no sign in was required or could not remember. The contractor responsible for logistical support confirmed no sign in was required during the conference.

Interviews of ONAP managers and supervisors indicated that it was individual supervisor's responsibility to watch their employees to ensure they attended required training. This included plenary sessions that all or nearly all 167 participants were required to attend.

Because there were no controls over time and attendance, we could not substantiate if any employees failed to attend required training.

Based on the fieldwork performed, there was not substantive evidence to indicate there was employee misconduct during required sessions at the ONAP Staff Training Conference.

Conclusion

The risk of damaging public trust is evident in this complaint. There were allegations of misconduct by employees, and no documentation to indicate who attended the training. Even though these allegations could not be substantiated, ONAP should have considered that in a casino environment it is easy for the public to get the wrong impression of what ONAP employees were doing at the location.

Effectiveness and Efficiency of Training

Federal guidance on travel and training

Managers must ensure that travel is for legitimate government purposes and that the travel is necessary to accomplish the purposes of government. Furthermore, efforts must be made to

ensure this is done in the most effective, efficient, and economical manner possible.

5 CFR, 301-1.101 states in part:

It is the policy of Government that agencies shall authorize only that travel which is necessary to accomplish the purposes of government effectively and economically.

5 CFR, 410.303 states in part:

Federal employees share with their agencies the responsibility to identify training needed to improve individual and organizational performance and identify methods to meet those needs, effectively and efficiently.

Conference travel was appropriate

Based on our fieldwork, we concluded that the training was effective and efficient with value in the training provided to employees.

The conference was held to train ONAP staff on job position duties and responsibilities in accordance with union agreements. The training was an all staff training conference which had been recommended by a consultant to improve morale.

Location of Reno chosen primarily on effectiveness and efficiency

Although it is questionable if a casino resort is the most prudent choice for training, Reno is centrally located in relation to the ONAP field offices and had necessary space to accommodate the 167 participants in the relatively short time frame ONAP had to complete the training. Reno was also close to Native American reservations in order for a tour to be taken by staff and for a Native American official to speak at the conference.

The training schedules reviewed indicated that required training was scheduled throughout the day and overall appeared to be on specific or general work related subjects. Training evaluations reviewed indicated that overall, the staff rated the training conference favorably.

Majority of staff interviewed felt there was value in the training

We selected ONAP employees in the Anchorage, Alaska, and Seattle, Washington, to get their perceptions of the value and efficiency of the training conference. The results of these

interviews indicated that a majority of employees found the training effective and efficient.

Conclusion

There was value in training for a majority of employees. Evaluations and comments appeared as a whole to be positive toward the conference. Overall, the training appeared to meet government purposes in an effective and efficient manner.

Auditee comments

The Assistant Secretary stated that he was pleased that we included the positive results of the training conducted for the ONAP staff. The Assistant Secretary added that the training was beneficial to the Department. He stated that the Office of Native American Programs is ready to implement the recommendation in the report.

Recommendation:

We recommend that the Assistant Secretary for Public and Indian Housing:

- 3A. ONAP officials ensure adequate controls are in place over attendance at future organizational training.

Management Controls

In planning and performing our review, we considered Office of Native American Programs (ONAP) management controls relating to our objectives to determine our procedures and not to provide assurance on internal controls.

Management controls over program operations include policies and procedures that management has implemented to reasonably ensure that a program meets its objectives. The components of internal control are interrelated and include integrity, ethical values, competence, and the control environment which includes establishing objectives, risk assessment, information systems, control procedures, communication, managing change, and monitoring. The entity's management is responsible for establishing and maintaining adequate systems of management controls.

Relevant controls

For the purpose of our review, we determined the management controls relevant to our objective were ONAP's policies, procedures, and practices relative to:

- ensuring the work environment is free of offensive or insensitive material and behavior.
- oversight and evaluation of ONAP offices by Headquarters ONAP to ensure management's compliance with work environment requirements.
- compliance with travel and training requirements.
- management's philosophy and strategies.

Scope of work

We evaluated the categories above by assessing control design, implementation, and effectiveness.

A significant control weakness exists if the controls do not give reasonable assurance that: action is taken to ensure the work environment is free of offensive or insensitive material or behavior; complaints and work environment issues are appropriately addressed in a timely manner; the organization safeguards resources by ensuring compliance with travel and training requirements.

Assessment Results

Based on our review, we identified the following significant control weaknesses in ONAP management controls:

- ONAP field office administrators failed to recognize that material they presented was culturally insensitive or offensive to Native people (see Finding 1).

- Headquarters ONAP failed to recognize material that was presented by administrators was offensive or insensitive (see Findings 1 and 2).
- Headquarters ONAP failed to take timely and appropriate action to address complaints by employees regarding material or actions perceived as offensive (see Finding 2).
- Headquarters ONAP has not conducted a review of Alaska ONAP office and had not previously conducted regular reviews of ONAP field offices. Planned reviews of programs and administration did not specifically include objectives of ensuring administration's compliance with work environment issues (see Finding 2).
- Headquarters ONAP did not ensure appropriate regulations were considered when determining if an individual is authorized to travel at government expense (see Finding 3).



U. S. Department of Housing and Urban Development
Washington, D.C. 20410-5000

September 26, 2000

OFFICE OF THE ASSISTANT SECRETARY
FOR PUBLIC AND INDIAN HOUSING

MEMORANDUM FOR: Robert H. Woodard, Assistant, District Inspector General for
Audit, OAGA

Milan G. G. G.
FROM: Harold Lucas, Assistant Secretary, P

SUBJECT: Draft report on Office of Native American Programs
Staff Training Conference, Reno, Nevada, December 6-9, 1999

I have reviewed the subject draft report and appreciate the diligence taken in following up on the complaint received. I share your concern and agree that any appearance of racial or cultural insensitivity at HUD will not be tolerated. Although it appears as if no harm was intended in the presentation of the skit, if one person is offended then action needs to be taken to ensure that the problem is corrected. I know that the Office of Native American Programs (ONAP) believes in the programs it administers and has tremendous regard for the Native Americans they serve and work with everyday.

I have a concern regarding the surveys identified in the report which are used to substantiate alleged management and morale problems. There is no evidence that the surveys were conducted in a scientific manner. Officials who were notified of the results of the Secretary Representative's survey are no longer with the Department and were evidently not interviewed regarding their response to the survey results. The survey results from the American Federation of Government Employees survey are provided for the Alaska office without any comparison of the results of the same survey in other HUD offices; therefore, the reader cannot determine whether the Alaska office fares better or worse than other HUD offices. I respectfully request that the information on both surveys be removed from the report.

I am pleased that the report also includes the very positive results of the training conducted for the ONAP staff. Notwithstanding the incident with the skit, an overwhelming majority of the staff provided feedback through evaluations indicating that they thought the training sessions were effective and efficient. The training was obviously beneficial to the Department and it is unfortunate that the skit cast a shadow over an otherwise effective training.

The Office of Native American Programs is ready to implement the recommendations and take the actions necessary to ensure that, in the future, no individual is offended by the actions of this Office.

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EEO/Diversity-Related Training for Alaska ONAP Officials Over Past Five Years

Position	Cultural Sensitivity	EEO	Communication	Human Relations	Diversity Mgmt.
Administrator	Cultural Sensitivity/Indian Law 09/96	NA	NA	NA	NA
Director, Grants Evaluation*	Cultural Sensitivity/Indian Law 09/96	NA	Communication Systems 03/00	NA	NA
Director, Grants Management	Cultural Sensitivity/Indian Law 09/96	NA	NA	NA	NA
Senior Advisor	NA	NA	NA	NA	NA
Grants Management Team Leader**	NA	NA	Communication Systems 03/00	NA	NA
Grants Evaluation Team Leader	NA	NA	NA	NA	NA

* The Director of Grants Evaluation has been selected for a new position of Community Builder and will be vacating the position as soon as approved by Headquarters.

** Team Leader position was filled in June 2000; the individual took the course prior to becoming a Team Leader.

NA = No specific training in this area noted for past five years.

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Distribution

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Assistant Secretary for Fair Housing and Equal Opportunity
Director, Office of Departmental Equal Employment Opportunity
Office of the Chief Financial Officer
Director, Enforcement Center