FY2019
Annual Performance Plan
# FY 2019 ANNUAL PERFORMANCE PLAN

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## MISSION

We promote economy, efficiency, and effectiveness in the administration of HUD programs through the use of traditional and innovative approaches. We protect the integrity of HUD’s programs and operations by identifying opportunities for HUD programs to progress and succeed.
INTRODUCTION

The work of the Office of Inspector General (OIG) is important to the Department’s success in fulfilling its Strategic Plan to address the Secretary’s mission priorities, management challenges, and mission-related goals. We must ensure that our resources and activities encompass the issues and concerns most critical to the Department. This Annual Performance Plan identifies the Fiscal Year (FY) 2019 goals, objectives, and measures that will help us better execute the U.S. Department of Housing and Urban Development’s (HUD’s) priorities and continue to assist the Department in identifying and taking corrective action to improve areas most vulnerable to waste, fraud, and mismanagement.

This Annual Performance Plan describes the specific projects and activities that we plan to undertake during FY 2019 to identify opportunities for cost savings and operational efficiencies; focus on prevention; and return hard dollars to the Department and the U.S. Treasury. This Annual Performance Plan contains the complete set of measures that the OIG will use to manage the organization towards accomplishing its goals and objectives. Those activities generate products—outputs, typically audit and evaluation findings, and criminal indictments. The outputs are provided to other organizations (e.g., department program officials or prosecutors) for disposition. We collaborate with these partners to achieve successful intermediate outcomes like civil actions, successful prosecutions, or administrative actions such as suspensions and debarments. Ultimately, all these efforts result in strategic outcomes like providing recommendations that foster stronger programs, substantial financial returns or recoveries, and broad deterrence of fraud, waste, abuse, and mismanagement.
VISION

We are a collaborative team of diverse, empowered professionals committed to excellence, innovation, our core values, and sharing our knowledge and best practices with the U.S. Department of Housing and Urban Development (HUD) and the Inspector General community. We leverage the specialized skill sets within the Office of Inspector General (OIG) to bring heightened awareness to HUD’s toughest challenges. We support HUD’s efforts to achieve stronger housing markets, quality and safer housing, and strengthened communities.

GOALS

Goal 1  Further HUD’s Mission Success: Assist HUD in developing an effective and efficient means of meeting its housing and community developmental goals and ensuring the integrity and accountability of program funds and operations.

Goal 2  Advance Operational Economy, Efficiency, and Effectiveness: Commit to high standards and continuous improvement activities to ensure that we model performance excellence.

Goal 3  Cultivate Positive Internal and External Stakeholders Relations: Increase engagement with HUD officials and external stakeholders to better understand their perspectives and build trust.

Goal 4  Invest in Ourselves and Our Organization Culture: Invest quality time in developing ourselves at the individual, team, and organizational levels and in creating an organizational work culture consistent with our leadership philosophy and core values.

Goal 5  Foster Strategic Thinking and Long-Term Planning: Forecast and continuously integrate future agency needs into HUD OIG’s strategy and decision making to sustain short- and long-term success.
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OUR STRUCTURE

HUD Office of Inspector General Organization Chart

As of 3/31/19
AREAS OF RESPONSIBILITY

The Office of Audit plans and conducts audits of departmental activities, which include (1) headquarters programs and operations and the activities of HUD’s field offices located in 10 regions, (2) hundreds of HUD programs and initiatives, and (3) thousands of contractors and program participants doing business with the Department. The Office of Audit’s significant workload is generally divided into four primary categories: performance audits, information system audits, financial audits, and advisory and assistance services.

The Office of Evaluation plans and conducts independent assessments of the design, implementation, and results of HUD’s operations, programs, or policies. The office provides a flexible and effective mechanism for the oversight and review of Department and agency programs by using a multidisciplinary staff and multiple methods for gathering and analyzing data. It can be used to determine the efficiency, effectiveness, impact, and sustainability of operations, programs, or policies and provide information that is timely, credible, and useful for agency managers, policy makers, and others. The Office of Evaluation is also responsible for data and predictive analytics as well as information technology (IT) evaluations of HUD IT and IT security programs.

The Office of Investigation plans and conducts investigations that vary in purpose and scope and may involve alleged violations of criminal or civil laws, as well as administrative requirements. The focus of an investigation may include the integrity of programs, operations, and personnel in agencies at Federal, State, and local levels of government; program, procurement, and grant fraud schemes; mortgage fraud, financial fraud, and whistleblower retaliation; and other matters involving alleged violations of law, rules, regulations, and policies.

The Office of Special Inquiry (OSI) is a multidisciplinary team of criminal investigators, forensic auditors, and investigative counsels. OSI has wide-ranging jurisdiction but focuses its work on significant issues with high-impact relevance, such as investigations of senior-official misconduct and reviews of enterprise-level financial or reputational risks to the Department.

The Office of Legal Counsel provides independent legal and policy advice to all components of the OIG on a variety of substantive and procedural matters relating to OIG’s audit, program evaluation, and investigation activities. The Office of Legal Counsel also represents the OIG in administrative litigation; manages the OIG ethics program, providing training, advice, and financial disclosure reviews; and coordinates OIG responses to Freedom of Information Act and other document requests. The OIG hotline, located within the Office of Legal Counsel, receives, analyzes, and reviews complaints and allegations against HUD programs.

The Office of Management and Technology is responsible for developing, implementing, managing, and supporting a strategic plan for OIG that aligns planning, resources, policies, processes, reporting, and performance measures for internal efficiency. It is also responsible for budget and administrative services, human resources, training, program integrity, infrastructure services, and information management. As the public affairs liaison point, this office communicates with the public and the media; and maintains the OIG Web page.
AREAS OF FOCUS

SAFE AND SANITARY HOUSING
Part of HUD’s mission is to provide quality, affordable homes for all. The housing HUD insures and funds must be decent, safe, sanitary, and in good repair. In addition to inspections a housing agency or local government may conduct, HUD’s Real Estate Assessment Center (REAC) assesses the physical condition of many of HUD’s insured and subsidized properties through contracted inspections. When inspections identify conditions that could cause a risk to the health and safety of residents, HUD requires property owners and public housing authorities to fix deficiencies that caused the risks. However, sometimes, HUD either is not aware of the risks to resident health or safety or fails to take timely action to mitigate risks. An example is the Alexander County Illinois Housing Authority where about 200 children and their families lived in units with peeling paint; graffiti; pest infestations; and other health and safety hazards, such as inoperable appliances and obstructed accessibility routes.

For fiscal year 2019, we identified: ensuring the availability of affordable housing that is decent, safe, sanitary, and in good repair as a top management challenge for HUD. Currently, a team of auditors and investigators is proactively identifying systemic deficiencies in the administration of public housing programs including reviewing for health and safety issues such as lead, mold and other hazardous conditions. Additionally, we have evaluations underway to review (1) HUD’s compliance with laws and regulations regarding taking public housing authorities into receivership, and (2) its actions to identify and mitigate health risks to residents in HUD-assisted housing located on or near sites contaminated with hazardous materials.

PROTECTION OF HUD’S INSURANCE
The Federal Housing Administration (FHA) is a component of HUD. Using the Mutual Mortgage Insurance fund (MMI), FHA insures lenders against losses when borrowers default on loans. This program allows lenders to make loans to individuals who might otherwise not be eligible for a conventional mortgage. As of December 2018, FHA insured a portfolio of more than 8 million mortgages with an outstanding principal balance of nearly $1.2 trillion which is approximately 25 percent of all mortgages in the United States.

Lenders submit claims for insurance benefits to FHA to cover losses. For those claims where the lender foreclosed and returned the property to FHA, and FHA then resold the property, FHA recovered only about 56 percent of the funds paid out as of December 2018. FHA is challenged in protecting the MMI. Without sufficient controls, oversight, and effective rules, the fund is at risk of unnecessary losses. Two examples risks to the fund are

Over 5 years, FHA paid an estimated $2.23 billion in unreasonable and unnecessary holding costs.
In 2018, FHA insured reverse mortgages had a negative net worth of $13.63 billion. As the claims on these loans are filed, the MMI fund will have to cover the losses.
FHA is improving on the examples above, but more needs to be done in these and other risk areas.

DISASTER OVERSIGHT
Congress appropriated $35.8 billion for HUD in 2017 and 2018 for recovery from Hurricanes Harvey in Texas; Irma in Florida, Georgia, South Carolina, and the U.S. Virgin Islands; Maria in Puerto Rico and the Virgin Islands; and Nate in Mississippi. These disasters resulted in the significant loss of human life and massive property destruction. As reported in our Top Management Challenges, HUD faces challenges in ensuring that grantees have the capacity to administer the funds, and they use disaster funds for eligible and supported items.
OIG oversight starts with an audit to assess the recipient’s capacity to administer the funds in accordance with program and Federal requirements. After funds are spent we will conduct additional audits to determine if the expenditures met applicable requirements. We conduct performance reviews to assess if there are more efficient and economical ways to operating the program. We also investigate frauds including falsified eligibility, duplicate payments, public corruption, and contracting and contract execution irregularities. Given the magnitude of the damage caused by these disasters and the extensive reconstruction and recovery efforts needed, OIG’s oversight will continue and significantly increase over the next several years.
FY 2019 WORK PLAN

Goal 1 – Further HUD’s Mission Success
Assist HUD in developing an effective and efficient means of meeting its housing and community development goals and ensuring the integrity and accountability of programs funds and operations

AUDIT

- Identify actual and potential monetary benefits totaling $900 million (15 to 18 times the portion of OIG’s budget allocated to the Office of Audit) through the identification of improvements to HUD programs and audit targeting of high-risk HUD program participants.

EVALUATIONS

Program Evaluation Division – produces a steady stream of program evaluations that improve departmental operations. We achieve this outcome by meeting the following measures and quality indicators:

- Complete 3 evaluation products that meet applicable quality standards and offer actionable recommendations (as appropriate) covering topics throughout HUD program areas.
- Issue recommendations with which the Department concurs, on received responses, at least 85 percent of the time.
- Refer for resolution 75 percent of unresolved-open HUD recommendations to more senior leadership if recommendations are more than 121 days past report issuance, which is 1 day past HUD’s due date for a management decision, or immediately if HUD management expresses disagreement with a recommendation.

INVESTIGATIONS

- Ensure 80% of all cases opened specifically address fraud relating to HUD’s Major Challenges and that investigations are completed in accordance with the Council of the Inspectors General on Integrity and Efficiency’s Quality Standards for Investigations. The Office of Investigation (OI) will identify and analyze all cases opened in Fiscal Year (FY) by Program and Sub-Program Area.

- Ensure 65% to 70% of all investigative subjects listed as HUD program participants that have entered the judicial system are accurately referred to the Departmental Enforcement Center (DEC) for Suspension and/or Debarment in accordance with HUD-OIG policy guidelines.

LEGAL COUNSEL

- If deemed appropriate for prosecution, OLC will prepare a referral on OA/OI administrative or civil actions to HUD OGC within 45 days of the determination of propriety 85% of the time.
- OLC will coordinate with the Department of Justice Civil Division in its efforts to combat HUD program fraud through regularly scheduled conference calls with DOJ and HUD OPE by acting as a
liaison between HUD-OIG investigation and audit regions and those entities to promptly identify cases in which civil actions might be appropriate. OIG investigation and audit regions will be advised of cases identified as a potential civil actions within 45 days of the date of receipt 85% of the time.

Goal 2 – Advance Operational Economy, Efficiency, and Effectiveness
Commit to high standards and continuous improvement activities to ensure that we model performance excellence.

AUDIT

- Between 84 and 94 audits (i.e., final reports/memos issued) will be completed, with 70 to 75 percent of the audits completed within organizational time standards; and, between 31 and 35 will be internal audits and 70 to 75 percent of these audits will meet applicable technical requirements as evidenced by conformance with organization report completion standards. As a subset of this goal:
  - To contribute to OIG’s goal of improving the integrity of SF programs, the Office of Audit will complete between 9 and 10 audits of the SF program.
  - To contribute to OIG’s goal of reducing erroneous payments in rental assistance programs, the Office of Audit will complete between 32 and 37 audits of the PIH program; and, between 8 and 9 audits of the MF program.
  - To contribute to OIG’s goal of contributing to significant issues raised or confronted by HUD and our stakeholders, the Office of Audit will complete between 19 and 21 audits of the CPD program; and, between 8 and 9 audits of Disaster Recovery funds.

- To contribute to OIG’s goal of improving HUD’s execution of and accountability for fiscal operations:
  - Financial Audit Division will complete between 3 and 4 audits (i.e., final reports/memos issued), with 70 to 75 percent of the audits completed within organizational time standards.
  - Information Systems Audit Division will complete between 2 and 3 audits (i.e., final reports/memos issued), with 70 to 75 percent of the audits completed within organizational time standards.
  - TOP will assure that at least 85 percent of reviews conducted within TOP are completed within 5 working days.
  - TOP will contribute to OIG’s goal of improving the integrity of SF programs by monitoring the completion of between 9 and 10 audits of the SF program.
  - TOP will contribute to OIG’s goal of reducing erroneous payments in rental assistance programs by monitoring the completion of between 32 and 37 audits of the PIH program; and, between 8 and 9 audits of the MF program.
  - TOP will contribute to OIG’s goal of contributing to significant issues raised or confronted by HUD and our stakeholders by monitoring completion of between 19 and 21 audits of the CPD program; and, between 8 and 9 audits of Disaster Recovery funds.
INVESTIGATIONS

- Ensure that 65 to 70 percent of investigations are presented to the appropriate prosecuting authority within 12 months of the case being opened.

MANAGEMENT

Budget Management Division:

- All formulation related activities should be completed by January 15 (non-transition years), March 1 (transition years). Meet regularly with program office stakeholders to ensure that their needs are being met and that process improvements are taking place where applicable.
- Create tool or mechanism that will help program offices project budgetary needs.
- Provide SES and other staff after-action analysis on the preceding fiscal year.
- Conduct long term FTE planning meeting by January 31st of the new fiscal year and Provide 10-year long range budget estimate to senior staff by January 31st of the new fiscal year.
- Increase the precision on allotments and allocations to reduce the mid-year augmentation and to control the funds remaining at end of the fiscal year.
- Determine budget estimates during budget formulation and execution phases, by the established deadline. Present formulation strategy to senior management by August 1st.
- Ensure that the HUD-OIG expenditures reflect HUD-OIG priorities and do not exceed available resources, and no more than 0.75% of appropriated 1-year funds remain unexpended.

TECHNOLOGY

Utilize cloud computing solutions.

- Prepare recommendation package for potential AutoAudit for Windows replacement to cloud-based solution.
- Develop and implement complete new employee/contractor onboarding and off-boarding workflow in ServiceNow

Enhance Information Security Posture and Compliance

- Ensure timely performance of annual DHS Penetration Test
- Implement replacement Intrusion Detection/Intrusion Prevention System
- Deploy Proofpoint email secure gateway appliances

EVALUATIONS

Information Technology Evaluation Division – produces a steady stream of program evaluations focused on the Department’s information technology systems addressing, as appropriate, mandates placed on the Office of Inspector General or risks internally identified.
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- Complete 60 percent of all evaluation products – from initiation notification to draft release – by congressionally established deadlines or within timeframes established in the study design.
- Refer for resolution 75 percent of unresolved-open HUD recommendations to more senior leadership if recommendations are more than 121 days past report issuance, which is 1 day past HUD’s due date for a management decision, or immediately if HUD management expresses disagreement with a recommendation.

LEGAL COUNSEL

Respond to a variety of issues/requests for information/legal decisions and interpretations associated with HUD-OIG programs. This will be measured by the following:

- The OLC shall complete requests for legal opinions within 50 days 80%-85% of the time.
- The OLC shall complete requests for subpoenas within 72 hours 80%-85% of the time.
- The OLC shall respond to Freedom of Information Act (FOIA) and Privacy Act requests within 20 business days of the receipt 80%-85% of the time.

Goal 3 – Cultivate Positive Internal and External Stakeholders Relations
Increase engagement with HUD officials and external stakeholders to better understand their perspectives and build trust.

AUDIT

The Office of Audit has a goal to identify and refer to HUD and other enforcement agencies those individuals and entities who defraud the Federal government; and, to assist HUD and other enforcement agencies in successfully bringing civil actions and/or imposing administrative sanctions. In furtherance of this goal, the Office of Audit will ensure that:

- Regions and Divisions evaluate each assignment for the potential for such referrals and provide support as warranted toward a goal of the Office of Audit completing 9 to 10 referrals and successful outcomes; and,
- TOP tracks, monitors, and oversees quality control of these same 9 to 10 civil fraud referrals and/or civil and administrative outcomes.

INVESTIGATIONS

- Ensure 65%-70% of closed cases are referred for a criminal, civil, administrative, financial result or an approved systemic implication report (SIR) referred to HUD to effect positive regulatory or policy changes.

MANAGEMENT

Communications:

- Develop podcasts to highlight mission critical reports and publications.
Goal: Publish 6 podcasts

- Bring attention to Audit, Investigative, and Evaluation reports by producing at a minimum 8 products as either Whiteboard Videos, Social Media Video Graphics, or Video Report Highlights.
  
  Goal: produce 8 videos, 4 by March 30, 2019 and 4 by August 31, 2019

- Launch a new digital newsletter to be issued monthly OIG-wide.
  
  Goal: launch January 2019

- Issue SAR for prior year semiannual period, ending September 30, 2018 and current semiannual period, ending March 30, 2019 timely.
  


- Provide quarterly tracking report of media mentions and media calls.
  
  Goal: Provide and upload to Communications Division landing page by 10\textsuperscript{th} of each month.

  Within 72 hours after a major media event, provide a Media Report to relevant staff.

EVALUATIONS

Office of Evaluation – divisions work collaboratively to achieve results greater than any one division can achieve or furthers the goals of the Office of Inspector General or Inspector General community at large.

Participate in or contribute to at least 8 projects to increase outcomes with other divisions, components, or OIGs.

Initiate and conduct or sponsor 8 knowledge sharing opportunities supporting:

A. Organizational Development

B. Awareness of HUD Programs and risks

C. Process Improvement within HUD OIG

D. Technical skills improvement development for OIG employees

  that materially improves employees’ work capabilities.

Facilitate or engage Department officials by holding at least 4 meetings that improve Office of Evaluation participants’ understanding of a program or agency’s operations.

LEGAL COUNSEL

Provide timely assistance to the HUD-OIG Office of Management and Technology (OMT) relating to Congressional and media communication. This will be measured by the following:
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- The OLC will review and comment upon, or if requested, prepare responsive correspondence for OM within negotiated time frames 80%-85% of the time.
- OLC shall review and draft proposed legislation, assist with Congressional inquiries and media within negotiated time frames 80%-85% of the time.
- OLC will review and comment upon human resource issues/matters within 40 hours of receipt or inquiries.

Goal 4 – Invest in Ourselves and Our Organizational Culture
Invest quality time in developing ourselves at the individual, team, and organizational levels and in creating an organizational work culture consistent with our leadership philosophy and core values.

MANAGEMENT

Financial Management Division:
- Hold at least 6 FCC meetings during the fiscal year in coordination and cooperation with BMD.
- Collaborate with the Department CFO Travel Office and Department of Treasury, Bureau of Fiscal Services Travel Section overseeing the issuance of GSA SmartPay Travel Charge Cards, Keep the timely HUD OIG refresher training compliance above 95% each year. Run delinquency reports every 16th of the month to monitor account activity and manage delinquencies. Send notices and follow up if necessary to resolve delinquencies with 30 days.

Contracts and Procurement (CAPD):
- Implementation of SmartPay 3
- Hold 8 brown bag sessions for CORs and Stakeholders – 3 by Q2; 3 by Q3; and 2 in Q4
- CAPD will lead more focus with program offices on Acquisition Planning by providing the CPO MOU mandated ASAP by deadline in September 2018
- Provide 100% COR and Purchase Cardholder/Approving Official feedback for inclusion on performance evaluations

CAPD will fully support the CPO MOU items to ensure oversight of CAPD operations:
- Procurement Management Review
- HHS OIG Govt Purchase Card review
- FPDS-NG independence verification and validation
- Maintenance of the 100% compliance with CPARS reports
- 100% compliance with CPO policy

Management Support Division:
- OA – Complete Phase III renovation NLT August 31, 2019.
- Phase IV – Begin Phase IV renovation NLT July 31, 2019.
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- Relocate OIG employees in PCP back to Headquarters NLT September 1, 2019.
- Miami – Complete office renovation NLT July 2019.
- Tampa – Complete office move NLT August 2019.
- Fort Worth – Complete office move NLT September 2019
- Conduct an AO Teleconference in the months of January, April, and August 2019

TECHNOLOGY

Optimize OIT operations.

- Initiate and chair Technology Working Group (TWG) sessions.
- Migrate OIT SharePoint, email and personal file storage to Microsoft Cloud
- Overhaul patch management procedures ensuring 75% of Server Critical/High’s mitigated
- Overhaul patch management procedures ensuring 75% of Workstation Critical/High’s mitigated.

Enable mobile workforce.

- Deploy Skype for Business Town Hall Meeting capability supporting agency-wide video teleconferencing solution.
- Develop action plan for closing Verizon Data Center in Denver, CO
- Research and prepare procurement artifacts supporting an FY2020 eFax solution
- Replace old iPhones to upgraded iPhone for 80% of HUDOIG personnel

- OIT Purchase Cardholders will: 1.) Submission and Processing of Manual Obligations to BFS before purchase. 2.) Timely Reallocation and reconciliation of purchase card transactions. 3.) Use of electronic GPC Log (to include document uploads). 4.) Maintenance of all purchase card documents for required.
- OIT Purchase Card Approving Officials will: 1.) Timely approval of all purchase card reconciliations. 2.) Submission and Processing of Manual Obligations to BFS before purchase. 3.) Maintenance of all purchase card documents for required.

EVALUATIONS

Integrated Data Analytics Division – addresses the data analytics needs of the Office of Inspector General and proactively identifies trends that lead to impactful audits, evaluations, and investigations.

- Deliver 25 data analytic work products that actively support OIG audits, evaluations, or investigations.
- Deliver 15 statistical sampling plans and projection results identifying funds put to better use that are 10 times the Office of Evaluation budget.
- Develop at least 2 model or monitoring tool that provides analytic insights into HUD programs that can support opened audits, evaluations, or investigations.
INVESTIGATIONS

Ensure 65%-70% of all investigations are closed and completed in accordance with the Council of the Inspector General on Integrity and Efficiency’s Quality Standards for Investigations with a Disposition Report Form (DRF) within 60 days of the final claimed action.

LEGAL COUNSEL

- Complete requests for legal opinions within 50 days 80 to 85 percent of the time.
- Complete requests for subpoenas within 72 hours 80 to 85 percent of the time.
- Respond to Freedom of Information Act and Privacy Act requests within 20 business days of the receipt 80 to 85 percent of the time.
- Revise and update the Continuing Legal Education Training Program (CLEPT) and deliver at least 3 training sessions.

Goal 5 – Foster Strategic Thinking and Long-Term Planning
Forecast and continuously integrate future agency needs into HUD OIG’s strategy and decision making to sustain short and long-term success

We will continually seek best practices, new technologies, and enhanced systems to improve performance.

EVALUATIONS

Plans, Performance, Risk Management and Engagement Division – ensures Office of Inspector General compliance with applicable policies and procedures; identifies, categorizes, and addresses Office of Inspector General enterprise risks; and develops and oversees implementation of the Office of Inspector General strategic plan.

Complete a reassessment of HUD OIG’s risk profile through collaborative efforts in coordination with the Risk Management Council to ensure risks remain the highest risks for HUD OIG.

Facilitate organizational development initiatives through at least 3 improvement activities to include the update or refresh of HUD OIG enterprise work products to ensure these products remain relevant to end users.
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INVESTIGATIONS

- Ensure that 65 to 70 percent of all investigative subjects listed as HUD program participants that have entered the judicial system are referred to the Departmental Enforcement Center for suspension and/or debarment.

MANAGEMENT

Human Capital Management Division:

- Ensure completion of inCompass Performance Management System (Midyear, Closeout) by May 30, 2019; Closeout task due by November 30, 2019.
- Ensure closeout of SES Performance Management System by meeting the milestone dates and ensuring that that awards are submitted for processing to BFS by PP 25
- Update and finalize webpage to modernize the onboarding experience for new hires by April 30, 2019
- Develop and Publish a HCMD Dashboard.
- Develop and implement hiring quarterly customer service surveys with a cumulative stratification score of 90% by March 29, 2019, June 28, 2019 and September 30, 2019.
- Form a working group that consist of two representatives from each component (Executive Level and Director) by January 31, 2019
- Complete Five-Step Workforce Planning:
  - Set the Strategic Direction – by March 29, 2019
  - Analyze the workforce- by April 30, 2019
  - Develop an action plan - by June 28, 2019
  - Implement action plan for Succession plan – by August 28, 2019

TECHNOLOGY

Restructure workforce and mission performance metrics for fluid paradigm.

- Develop and advertise new Branch Chief position description to run and improve operations for Infrastructure Operations Division.
- Develop and advertise new Branch Chief position description to run and improve operations for Customer Experience Division.
- Develop and advertise Internet Engineer position description to run and manage Drupal, SharePoint and Cloud systems.
- Ensure all OIT personnel are trained Agile Project Management principles.
- Ensure all OIT personnel achieve and/or maintain COR2 certification.

LEGAL COUNSEL

Identify potential Program Fraud Civil Remedies Act (PFCRA) or False Claims Act (FCA) cases for potential prosecution, thereby enabling the Office of Legal Counsel (OLC) to assist in deterring fraud, penalizing
those who commit fraud and contribute to OIG’s goal of improving the integrity of HUD programs. This will be measured by the following:

OLC shall review for PFCRA or FCA potential and, if selected for in-depth consideration, process and decline or refer to the HUD Office of General Counsel (OGC) for litigation within 45 days of their selection between 80-85% of the time.