

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Program Office Salaries and Expenses Office Fair Housing and Equal Opportunity

SALARIES AND EXPENSES

(Dollars in Thousands)

	2022*	2023			2024		
	Actuals	Carryover	Enacted	Total	Carry Over	President's Budget	Total
Personnel Services	\$81,526	\$8,630	\$82,227	\$90,857	\$6,040	\$98,765	\$104,805
Non-Personnel Services							
Travel	334	60	770	830		685	685
Transportation of Things	16	-	-	-	-	-	-
Rent and Utilities	-	-	2	2	-	2	2
Printing	1	-	5	5	-	6	6
Other services/Contracts	1,676	-	3,502	3,502	-	4,663	4,663
Training	-	-	450	450	-	494	494
Supplies	40	-	77	77	-	85	85
Furniture and Equipment	-	-	-	-	-	-	-
Claims and Indemnities	8	-	-	-	-	-	-
Total, Non-Personnel Services	\$2,075	\$60	\$4,806	\$4,866	-	\$5,935	\$5,935
Working Capital Fund	3,663	-	3,927	3,927	-	2,500	2,500
Carryover	8,690	-	6,040	6,040	-	-	-
Grand Total	\$95,954	\$8,690	\$97,000	\$105,690	\$6,040	\$107,200	\$113,240
FTEs	548	56	533	589	37	610	647

*Includes 2021 carryover

PROGRAM PURPOSE

The Office of Fair Housing and Equal Opportunity's (FHEO) mission is "to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws." FHEO's fundamental duty, therefore, is to help create equal housing and credit opportunities for all persons living in America, which it does by administering and enforcing laws that prohibit housing discrimination on the basis of race, color, religion, national origin, sex (including gender identity and sexual orientation), age, disability, and familial status.

The Administration has made fair housing a central pillar in its equity agenda, requiring a revitalized FHEO to play a key role. FHEO is tasked with simultaneously addressing both day-to-day discrimination claims and longstanding systemic inequities that are the legacy of a long history of racial and other injustices. This investment in FHEO's salaries and expenses will ensure that work is done efficiently and effectively.

BUDGET OVERVIEW

The 2024 President's Budget requests \$107.2 million for the Office of Fair Housing and Equal Opportunity, which is \$10.2 million more than the 2023 enacted level. The Budget reflects total funding (carryover and new authority) of \$113.2 million, \$7.6 million above 2023 total funding.

The goal of this funding is to bolster the Office of Fair Housing and Equal Opportunity's (FHEO) staffing and ability to carry out its mission.

Personnel Services (PS)

The Budget assumes total funding of \$104.8 million for PS, \$14 million above 2023 total funding. This funding will support 647 full-time equivalents (FTEs), 58 FTEs above the 2023 total level. Funding at this level will allow FHEO to continue to backfill critical vacancies and establish additional management and staffing capacity to assist in mitigating identified risks, address unmet needs, support Departmental strategic goals, and key operational initiatives. The Budget also supports a 5.2 percent Federal pay raise.

This Budget will allow FHEO to build on the successes and gains projected to be made in enforcement and Fair Housing Act (FHA) compliance activities in 2023; indeed, FHEO will have the requisite funds available to carry out the sophisticated policy and substantive work ahead of the Agency in 2024. Enforcement and Compliance staff at Headquarters and in field offices will handle the increased workload in compliance and enforcement activities, including, but not limited to, intake assessment and complaint processing and provision of technical assistance to HUD grantees at the State and local level. This funding level will support fair housing and civil rights compliance activities and combat other challenges in HUD-funded programs and projects such as disability discrimination and violence against women participating in HUD programs.

Moreover, this funding level will restore subject matter expertise at FHEO Headquarters that was lost through attrition in prior years. Affirmatively Furthering Fair Housing (AFFH) is a priority of the Administration, and FHEO is charged with implementing these requirements in 2024. HUD continues regulatory proceedings necessary to return to a more comprehensive implementation of the FHA's mandate to AFFH. Therefore, the HUD budget level includes: five additional subject matter experts (SMEs) at Headquarters to develop policies and guidance on program compliance, accessibility, integration, and nondiscrimination in vulnerable housing communities; seven additional FTEs in the field to make progress toward addressing an existing and growing capacity gap related to increasing workload on nondiscretionary FHA intake and enforcement work, and grants management; five additional FTE for Regulatory Agenda and Policy Development to support the expansion of critical resources to support civil rights compliance across HUD programs and the advancement of the Department's civil rights regulatory compliance and equity agenda; four additional FTE for the Violence Against Women's Act (VAWA) enforcement and implementation efforts, and three FTE for the Fair Housing Initiatives Program (FHIP).

FHEO will employ highly skilled staff with specialized capabilities and experience in addressing disparities and discriminatory housing practices, including those in the lending and appraisal industries. FHEO will build on increases from 2023. FHEO is projected to end 2023 at 589 FTEs. The additional 58 FTEs, over the 589 FTEs projected in 2023, will support FHEO's acquisition plan to hire skilled equity experts. FHEO will continue its practice of maintaining its primary staffing in the field. FHEO currently has more than 70 percent of its staff located in the field.

The 2024 Budget for these initiatives aligns with HUD's Strategic Objective 1A: *Advance Housing Justice*, by providing essential personnel and non-personnel services to support several workstreams

driven by the Administration's policy priorities. To support the foregoing initiatives and activities, the additional FTEs will be allocated as follows:

AFFH: The proposed AFFH funding level aligns with the Administration's priorities and HUD's Strategic Objective 1A: *Advance Housing Justice*. In 2024, FHEO plans to hire additional FTEs to support this effort. The specific components of FHEO's AFFH work, all of which require resourcing at an adequate level, include:

- **Technical Assistance (TA)**: To increase the volume and quality of AFFH TA, as requested by HUD funding recipients and other stakeholders and HUD program offices, FHEO must increase its staff to provide oversight of TA providers and oversee direct TA to HUD funding recipients.
- **Data & Mapping**: FHEO requires resources to develop improved mapping functionality that can help HUD staff and HUD-funded recipients identify barriers to fair housing. AFFH requires improvements to the current AFFH-T tool and may require other potential technology needs. The necessary improvements will require contracting support as well as additional in-house capability through expanded licensing and training on Arc Geographic Information System (ArcGIS) and Microsoft Power Business Intelligence (Power BI) tool. As a component within HUD's geospatial data program, FHEO is collaborating with the Offices of the Chief Information Officer (OCIO) and Policy, Development and Research (PDR) to develop these improvements and interfaces. This expanded capability will allow FHEO to provide relevant data for HUD-funded recipients.
- **Guidance**: FHEO anticipates the need for new and targeted sub-regulatory guidance for AFFH to follow the completion of the rulemaking process. Guidance may also be necessary under the current AFFH interim final rule. This work will require dedicated staffing and expertise.
- **Communication**: Key to the successful implementation of any present or future regulatory updates to AFFH will be clear, consistent, and focused on education and outreach. FHEO plans for a targeted education and outreach strategy on AFFH compliance requirements and benefits. This essential communication function requires additional staffing.
- **Staffing**: Expertise for oversight and review of current voluntary fair housing plan submissions and future fair housing plans are an important aspect of AFFH implementation.

PAVE Implementation and Fair Lending: Secretary Fudge and the Office of the Secretary have successfully managed the work of the PAVE Taskforce from its inception through its current stage. The President's directive to the PAVE Taskforce was to quickly utilize the many levers at the Federal Government's disposal to root out discrimination in the appraisal and homebuying process. These levers include potential enforcement under fair housing laws, regulatory action, and development of standards and guidance in close partnership with industry and State and local governments. On March 23, 2022, the PAVE task force delivered a final action report that: (i) describes the extent, causes, and consequences of undervaluing of properties; and (ii) finalizes and releases a roadmap of consumer facing industry actions and inter and intra agency administrative policy initiatives. An implementation strategy to carry out the 41 commitments established in the action plan are underway and targeted efforts to operationalize the actions are being executed by HUD and other task force member agencies with target dates ongoing in 2024.¹

Function of the Office of Fair Lending: The PAVE Action Plan represents the most wide-ranging set of equity reforms to the home appraisal process since the Congress passed landmark financial reform legislation in 1989. The PAVE Action Plan has garnered the attention of a broad base of stakeholders including the House Financial Services Committee, lending and appraisal industry,

¹ <https://pave.hud.gov/>

and advocacy groups. FHEO is responsible for the implementation of the Action Plan's commitments, which includes harmonizing and collaborating enforcement efforts with the Department of Justice (DOJ), Federal Housing Finance Agency (FHFA), and the Consumer Financial Protection Bureau (CFPB). As a result of these efforts, FHEO has seen a marked increase in the number of lending and appraisal complaint filings. Additional FTEs will be located at Headquarters to support PAVE and Fair Lending enforcement efforts.

Field Staff: FHEO is proposing an increase of field staff throughout the 10 HUD regions to make progress toward addressing an existing and growing capacity gap related to increasing workload on non-discretionary FHA intake and enforcement work and grants management. FHEO regional staff require robust staffing resources to carry out complicated front-end work and sophisticated compliance investigations on criminal records policy, environmental justice, nuisance ordinances, and program compliance with the Fair Housing Act.

Regulatory Agenda and Policy Development: FHEO is proposing a few additional FTEs in 2024 to support the expansion of critical resources to support civil rights compliance across HUD-programs and the advancement of the Department's civil rights regulatory compliance and equity agenda. FHEO leads the Department's activities to eliminate discrimination in HUD programs and is the Department's primary driver of activities under the President's Memorandum on Redressing Our Nation's and the Federal Government's History of Discriminatory Housing Practices and Policies.

Currently, FHEO seeks to establish sufficient protocols and resources to ensure front-end civil rights reviews in Departmental activities that present a high risk of civil rights liability. This includes ensuring the application of longstanding site and neighborhood Standards in newly sited assisted housing projects and reviewing State Action Plans for the distribution of billions of dollars of Federal disaster funds.

National Fair Housing Training Academy (NFHTA): FHEO is proposing to add FTE to support operations of NFHTA. NFHTA provides consistent national training on fair housing laws, emerging fair housing and civil rights issues, and all processes related to comprehensively establishing jurisdiction, investigating, and conciliating fair housing complaints for State and local government agencies and nonprofits participating in FHAP and FHIP programs through a managed training curriculum. A key purpose of NFHTA is to continue to build the capacity and core competencies of investigators and fair housing practitioners to ensure timely, comprehensive investigations and remedies that support enforcement of the Fair Housing Act.

Violence Against Women's Act (VAWA): The 2022 VAWA reauthorization requires the Secretary of HUD to establish the Office of Gender-Based Violence Prevention, which will be led by the new Violence Against Women Act Director. The Act also creates a new enforcement and implementation structure that relies on FHEO and will require significant additional resources. As proposed in the FHEO reorganization request submitted in January 2023, HUD prefers the VAWA office to be located within FHEO. This will allow the Department to leverage existing FHEO resources, like NFHTA, to support this work. In addition, FHEO staff are already conducting VAWA related investigations as required by law. The four FTEs allocated to the Office of Gender Based Violence Prevention will coordinate with Federal agencies and State and local governments on advancing housing protections and access for survivors as well as ensuring related technical assistance and support, consistent with the authorizing statute and other statutory mandates.

Limited English Proficiency Initiative (LEPI): The proposed LEPI funding level aligns with HUD's Strategic Objective 1A, and the other overarching priorities discussed herein, which directly or indirectly affect persons with limited English proficiency (LEP). FHEO's work on LEPI supports the entire Department. LEPI fortifies support for vulnerable populations and underserved communities by ensuring meaningful access to HUD-administered and sponsored programs, services, and activities by persons with LEP.

Fair Housing Initiatives Program (FHIP): The proposed FHIP funding level aligns with HUD's Strategic Objective 1A for additional Headquarters and regional staff with financial management and grants management skills to provide oversight and TA more effectively and efficiently to our fair housing partners. Effectively managing the voluminous number of grant awards requires ongoing TA and oversight, especially when addressing grants with complex fiscal or grant performance issues.

Risk Management

LEPI: The current staffing level is inadequate to develop and conduct training for approximately 7,400 HUD staff and all HUD-funded recipients. FHEO administers the language assistance services program for the entire Department. Any reduction in FTEs for this Administration priority will hinder the Department's ability to fully and adequately implement programs that directly benefit grantees and the public.

FHIP: FHIP is currently providing oversight for approximately \$47 million in unexpended obligations. Due to the manual program and financial management processes, there is inherent risk with FHEO's oversight of the grant funds and its ability to validate pre-award and post award performance data. In 2022, FHIP awarded approximately 180 additional grants totaling \$56 million. The effective management of these overlapping grants is becoming increasingly difficult to manage without adequate resources and staffing.

AFFH: HUD's previous AFFH experience and stakeholder feedback make it clear that effective AFFH implementation requires significant resources for staffing, proper training, technological support, and communications expertise.

VAWA Enforcement: From the outset of FHEO's enforcement of VAWA on October 1, 2022, significant numbers of potential survivors have availed themselves of the new complaint process, creating an unprogrammed level of intake and complaint investigation work for FHEO. FHEO expects this workflow to increase exponentially with the publication of HUD's VAWA website and public notices, with HUD grantees and recipients more uniformly informing victims of their VAWA rights, and as stakeholder organizations advise victims of the right to file individual complaints with FHEO against any of over 40,000 VAWA-covered housing programs. The timely and effective intake and investigation of jurisdictional VAWA complaints will require significant new resources or FHEO will be forced to divert its scarce resources from enforcing other civil rights authorities.

Non-Personnel Services (NPS)

The Budget assumes total funding of \$5.9 million for NPS, \$1.1 million above 2023 total funding. The increases and decreases are as follows:

- Travel: Decrease in travel by \$145 thousand due to multiple mission trainings realized in 2023 but not expected to reoccur in 2024. Funding will be needed in 2024 for litigating cases, undertaking fair housing investigations, conducting compliance reviews, investigating VAWA investigations, and education and outreach efforts.
- Training: Substantial training is needed for the disproportionately large number of new employees and to train existing staff on fair housing investigative techniques and mission related skills. Additionally, no staff currently have training on VAWA enforcement, new as of October 1, 2022. Therefore, FHEO must provide VAWA training customized for all its workstreams. Funding provides an increase of \$44 thousand above the 2023 level.

- **Contracts:** The FHEO Budget requests \$4.7 million to fund new contract requirements and continue renewed contracts, \$1.2 million above 2023 total funding. The increase consists mainly of the contracts as detailed below:

2024 Renewed Contracts	Funding Level
*Grants Management	\$550,000
**Customer Relationship Management (CRM)	\$360,000
Total	\$910,000

*New procurement

**Increase in funding request for existing procurements.

- Grants Management: This contract supports FHEO’s ability to monitor the financial management of its grantees under the FHIP to assure compliance with applicable financial requirements and provide guidance on corrective measures needed to bring grantees determined to be in noncompliance back into compliance.
- Marketing Cloud and Customer Relationship Management (CRM): This contract supports FHEO’s responsibility of increasing awareness of the public’s fair housing rights and of the housing providers fair housing responsibilities. Also, the contract will increase public engagement through human-centric designed automation to improve HUD customers’ experience.
- In addition to new contract services, FHEO will use the remaining funds to maintain existing procurements in the amount of \$3.8 million.

Working Capital Fund (WCF)

The WCF funding level for 2024 is \$4.3 million, of which \$2.9 million will be forward funded in 2023. The 2024 WCF funding level is \$1.3 million above the 2023 funding level. This level reflects payments for baseline WCF services (including inflationary adjustments and changes in service utilization) and the addition of the End-User Devices, Scanning and Archiving Services business lines.

Information Technology (IT)

Within the IT Fund, the Budget requests \$4.5 million to support Affirmatively Furthering Fair Housing Compliance Improvements, Fair Housing Initiative Program Performance Tracking Database and HUD Enforcement Management System.

Affirmatively Furthering Fair Housing Compliance Improvements - \$2 million: The Fair Housing Act requires HUD and recipients of Federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act. To facilitate the development of Fair Housing Planning documents required of the AFFH process, it is necessary to provide funding for two legacy systems that were created for the implementation of the 2015 Affirmatively Furthering Fair Housing Rule.

The Data and Mapping Tool (AFFH-T) and the AFFH User Interface (AFFH-UI) are the capabilities that must be fully operationalized within HUD. The AFFH-T is online and has been maintained but was never fully actualized; it provides information at the local level but not at the PHA or State level. However, to provide more updated maps, better usability, and more information, HUD is requesting additional funding to make improvements to the tool.

FHIP Performance Tracking Database - \$1 million: The Office of Fair Housing and Equal Opportunity (FHEO) has been monitoring the Fair Housing Initiatives Program (FHIP), a multi-million-dollar grants program, for almost twenty years without a grants management system. In 2022, grant funds will be awarded to over 122 organizations. FHEO anticipates an increase in eligible organizations in future years. This will make it very difficult to effectively manage the program with multiple, overlapping grants using ad hoc manual systems. HUD requires a cloud-based grants management system that will provide a centralized tracking and monitoring system for its open grants.

HUD Enforcement Management System (HEMS) - \$1.5 million: Currently, the HEMS system is designed and equipped to handle only Fair Housing Act cases. Under Title VIII, however, there is still a need to support other types of investigations and reviews, including, but not limited to, Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. FHEO currently has no automated system to hold investigations and reviews done under these authorities; there are only paper records. While there are differences in what fields would be needed in a system for these authorities, much of the basic functionality is similar to what is currently in HEMS.

For additional information regarding HUD's IT investments, please see the Information Technology Fund justification.

Key Operational Initiatives

The Budget includes funding to address the operational, strategic, compliance, and reporting risks impacting HUD's work in local communities. Funding at this level is critical to address human capital risks impacting core workload, succession planning, and improve overall customer experience, and is necessary to address information technology limitations and acquisitions to meet regulatory requirements for its programs.

FHEO is statutorily obligated to investigate, conciliate, and when appropriate, administratively enforce several Federal civil rights statutes, including, inter alia, Title VI of the Civil Rights Act of 1964 (Title VI); the FHA; and Section 504. In addition to FHEO processing over 1,700 complaints in 2022, the Office also oversaw more than 5,700 complaint investigations conducted by FHAP agencies. Additionally, FHEO now investigates complaints brought under the 2022 Reauthorization of the VAWA. The FHAP agencies investigate approximately 75 percent of the administrative fair housing complaints filed in the country. FHEO also administers and oversees FHIP, through which it funds more than 128 private fair housing groups and non-profits nationally that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase, rent or finance housing. By funding entities through FHAP and FHIP, the Department not only ensures enforcement of several Federal statutes, but also promotes State and local control in concerns relating to their communities.

Technical Assistance: AFFH requires significant allocation of TA funding for HUD funding recipients. This includes, but is not limited to, hands-on training to establish meaningful and actionable goals to eradicate systemic patterns of segregation. FHEO proposes to lead in-person and regional trainings as well as create an interactive catalog of web-based trainings and resources that will be accessible to the public.

Communications and Guidance: Communicating a clear and effective message around what AFFH is and is not, is critical for the successful implementation. Setting a clear communications strategy requires a Trust and Safety Taskforce to aggregate and review social media data, create incident reports, and establish mitigation workflows. In addition, HUD will create a tech partnership and civil society outreach program to assist the Department in clearly communicating the benefits of implementing AFFH. The data collected from the Trust and Safety Team will inform efforts

including but not limited to guidance documents, a comprehensive guidance manual for AFFH, and digital media content. Contractor support will be utilized to enhance these efforts.

Data and Mapping: A robust and agile data and mapping tool is an integral part of AFFH. Data that comes from a myriad of internal resources and of HUD funding recipients, can further the collective understanding on ways to improve outcomes for all. However, FHEO currently lacks access to many systems and could use contractor support to determine sources. This tool would take input and coordination with OCIO and PDR, and other program offices. A portion of the funding would be used to begin preliminary data mining as a permanent long-term solution is explored.

Equity

Funding will be used to support priorities including diversity, equity and inclusion, staff capacity, data analytics, and automation. This Budget makes an investment toward advancing racial equity and supporting protected class members, underserved communities, and populations.

FHEO's priorities are in support of the President's Management Agenda (PMA): Advancing Equity through the Federal Government.

Equity agenda (AFFH and PAVE): Advancing Racial Equity and Support for Underserved Communities under EO 13985 and Appraisal Equity Initiative.

- IT/Technological Support: (1) Improving AFFH-T to allow grantees an opportunity to see maps and demographic information from vetted and reliable sources are proposed to assist in their understanding of the unique factors of their jurisdiction; and (2) Building an AFFH User Interface (AFFH-UI) to provide grantees with a portal for digital filings of AFFH reports that will replace a cumbersome paper-based process.
- Resources (funding and staffing): Significant investment in staffing, data and mapping tool, and overall infrastructure to manage the work.
- FHIP (Grants Management Solutions, monitoring, database mapping): Engaging and partnering with other Federal Agencies on tying in resources and data to assist HUD funding recipients to make transformational change in communities and jurisdictions.
- Employee Development: Increasing training opportunities through the Professional Development Institute and strengthening HUD's internal capacity and efficiency, while also focusing on ways to support HUD grantees, States, counties, cities, and Tribes to ensure delivery of HUD's mission on the ground.
- VAWA technology expansion will:
 - Make necessary technical expansion to include VAWA intakes and investigations, and related compliance reviews under additional Civil Rights authorities in the HUD Enforcement Management System (HEMS) or develop a new system if integration is untenable.
 - Provide other technological enhancements necessary for enforcement of VAWA issues, such as studying demographics impacted by nuisance and crime free ordinances, facilitating research of municipality ordinances, and other unique features.
 - VAWA enforcement may have higher confidentiality requirements than traditional enforcement, and new systems may need to be developed to address these concerns and adequately protect victims.

Operational Improvements

The advancement of housing justice for protected class groups and underserved communities

requires FHEO to reorganize and realign its business structure in 2024. The reorganization and realignment will allow FHEO to achieve better operational efficiencies including improved communications, increased accountability, transparency, quality, and improved decision-making by realigning leadership and resources, including dedicated staff in the fair housing space.

Restructuring: As submitted to the committees on January 3, 2023 for approval, FHEO is pursuing the following organizational changes to better align Headquarters operational functions and workload:

- The Office of Field Oversight will be repurposed and renamed the Operations Support Division. This division will fall under the DAS for Operations. The Correspondence Unit will be absorbed into the Operations Support Division.
- Establish the Office of DAS for Field Operations. This DAS will be responsible for the operations of the DAS for Field Operations office, with oversight responsibility for administrative, resource, and execution workloads. The Regional Directors will be realigned to report to DAS for Field Operations.
- The DAS for Operations will rename the Office of Information Services and Communication to the Office of Information and Technology Management.
- Create the Office of Field Development. This Office will fall under the DAS for Field Operations and will be responsible for training staff on FHEO policies and procedures; it will also provide advisory support to the Office of the DAS for Enforcement and DAS for Compliance in facilitating the implementation of policies and procedures.
- The functions of the DAS for Enforcement and Programs will be bifurcated into two offices: Office of the DAS for Enforcement and Office of the DAS for Compliance. The DAS for Enforcement will oversee the Office of Enforcement, Office of Fair Housing Assistance Program, and the Systemic Investigation function – the Office of Systemic Investigations becomes a standalone office. The newly created Office of Fair Lending and the NFHTA Office will be led by the DAS for Enforcement.
- The Office of the DAS for Compliance will oversee the Office of Compliance, the Office of Disability, and the Office of Program Standards currently led by the DAS for Policy, Legislative Initiatives and Outreach.
- The DAS for Policy, Legislative Initiatives and Outreach will absorb the Office of Fair Housing Initiatives Program currently aligned to the DAS for Enforcement and Programs.
- Realignment of the Office of Gender-Based Violence Prevention, which will be led by the Violence Against Women Act Director, will coordinate with Federal agencies and state and local governments on advancing housing protections and access for survivors as well as ensuring related technical assistance and support, consistent with the authorizing statute and other statutory mandates. 34 U.S.C. 12493. The Office of Gender-Based Violence Prevention and the Violence Against Women Act Director will report directly to the General Deputy Assistant Secretary for FHEO.

Without this much-needed reorganization, FHEO's capacity to further address equity and housing justice will be compromised. As such, FHEO must evolve and ensure FHEO has a modern structure to champion contemporary civil rights issues. As the organization currently exists, at least 75 percent of FHEO's resources are housed under the Deputy Assistant Secretary for Enforcement and Programs. This exposes FHEO to risk as it is dependent upon one individual to manage the full scope and breadth of the majority of FHEO's functionality with no additional executive leadership support. Separating the functions of enforcement and compliance and realigning the program offices to support a functional reorganization would allow for more dedicated oversight, resources, and improved efficiency.