

U.S. Department of Housing and Urban Development
2021 Chief FOIA Officer Report

Section 1: Steps Taken to Apply the Presumption of Openness

The guiding principle underlying DOJ's FOIA Guidelines is the presumption of openness.

Please answer the following questions in order to describe the steps your agency has taken to ensure that the presumption of openness is being applied to all decisions involving the FOIA. You may also include any additional information that illustrates how your agency is working to apply the presumption of openness.

A. FOIA Leadership

1. The FOIA requires each agency to designate a Chief FOIA Officer who is a senior official at the Assistant Secretary or equivalent level. See 5 U.S.C. § 552(j)(1) (2018). Is your agency's Chief FOIA Officer at this level? Yes
2. Please provide the name and title of your agency's Chief FOIA Officer.

Kevin McNeely – General Deputy Assistant Secretary for Administration

B. FOIA Training

3. The FOIA directs agency Chief FOIA Officers to ensure that FOIA training is offered to agency personnel. See 5 U.S.C. § 552(a)(j)(2)(F). Please describe the efforts your agency has undertaken to ensure proper FOIA training is made available and used by agency personnel.

During the year, the Department of Justice announces training opportunities for various FOIA topics. The FOIA Branch Chief sends those communications to all FOIA staff within HUD's FOIA Branch as well as to departmental FOIA liaisons. The Department provided FOIA training to all Regional FOIA Liaisons in FY20 and training to its FOIA liaisons on the FOIA management system.

4. Did your FOIA professionals or the personnel at your agency who have FOIA responsibilities attend substantive FOIA training during the reporting period such as that provided by the Department of Justice? Yes
5. If yes, please provide a brief description of the type of training attended or conducted and the topics covered.

HUD staff attended trainings provided by the Department of Justice's Office of Information Policy, including:

- Introduction to the Freedom of Information Act
- The Freedom of Information Act for Attorneys and Access Professionals
- Advanced Freedom of Information Act Seminar

Regional Office General Counsel attorneys also offer FOIA training to Region and Field FOIA staff. For example, attorneys in Region 6 provided training in July to all Regional staff with FOIA duties on the steps involved in processing FOIA requests, with special focus on applying FOIA exemptions. Region 5 staff received training on that Region's newly updated FOIA standard operating procedures. Subjects that were covered included the use of commonly cited exemptions, use of shared folders, and how to redact in Nuance Power PDF.

Headquarters FOIA specialists received training on eDiscovery procedures and fee waivers.

6. Please provide an estimate of the percentage of your FOIA professionals and staff with FOIA responsibilities who attended substantive FOIA training during this reporting period. 80%

7. OIP has directed agencies to "take steps to ensure that all of their FOIA professionals attend substantive FOIA training at least once throughout the year." If your response to the previous question is that less than 80% of your FOIA professionals attended training, please explain your agency's plan to ensure that all FOIA professionals receive or attend substantive FOIA training during the next reporting year. N/A

C. Outreach

8. Did your FOIA professionals engage in any outreach or dialogue with the requester community or open government groups regarding your administration of the FOIA? Please describe any such outreach or dialogue, and, if applicable, any specific examples of how this dialogue has led to improvements in your agency's FOIA administration.

- Region 2 engaged in a dialogue with media requesters, fair housing advocacy groups, and private attorneys to discuss fees, search capabilities, FOIA statutes, and implementing regulations.
- Region 5 engaged in one-on-one conversations with several frequent requesters, such as legal aid organizations and nonprofit advocacy groups. Topics included information that may be found on publicly available websites, fee estimates, and timelines for filling requests.

D. Other Initiatives

9. Describe any efforts your agency has undertaken to inform non-FOIA professionals of their obligations under the FOIA. In particular, please describe

how often and in what formats your agency provides FOIA training or briefings to non-FOIA staff.

On an as-needed basis, some of the program area staff who are responsible for conducting searches for responsive records have reached out to the Headquarters FOIA staff to get a better understanding of the FOIA. Throughout FY20, FOIA staff provided one-on-one training regarding meeting deadlines and/or requesting extensions, providing clarification, fees, and search parameters.

Section II: Steps Taken to Ensure that Your Agency Has an Effective System in Place for Responding to Requests

DOJ's FOIA Guidelines emphasize that "[a]pplication of the proper disclosure standard is only one part of ensuring transparency. Open government requires not just a presumption of disclosure, but also an effective system for responding to FOIA requests." It is essential that agencies effectively manage their FOIA program.

Please answer the following questions to describe the steps your agency has taken to ensure that the management of your FOIA program is effective and efficient. You should also include any additional information that describes your agency's efforts in this area.

1. For Fiscal Year 2020, what was the average number of days your agency reported for adjudicating requests for expedited processing? Please see Section VIII.A. of your agency's Fiscal Year 2020 Annual FOIA Report.

12.06 days

2. If your agency's average number of days to adjudicate requests for expedited processing was above ten calendar days, according to Section VIII.A. of your agency's Fiscal Year 2020 Annual FOIA Report, please describe the steps your agency will take to ensure that requests for expedited processing are adjudicated within ten calendar days or less.

The Department plans to enhance communications between the FOIA Branch and the components of the agency that search for and collect responsive records. When a request for expedited processing is approved, the underlying request is marked accordingly in the Department's FOIA management system. This approval is communicated to staff members in all necessary areas, not just within the FOIA Branch, to ensure that such requests are properly prioritized and are given the attention necessary to meet the heightened threshold. In addition, in FY21, the FOIA Branch Chief will be stressing, to FOIA Headquarters staff, that they consistently address requests for expedited processing.

3. During the reporting period, did your agency conduct a self-assessment of its FOIA program? If so, please describe the methods used, such as reviewing Annual Report or raw data, using active workflows and track management, reviewing, and updating processing procedures, etc.

No self-assessment was conducted.

Note: In September 2017, OIP released a FOIA Self-Assessment Toolkit as a resource for agencies conducting a self-assessment of their FOIA program. The Toolkit is available on OIP's website for all agencies to use.

4. Standard Operating Procedures (SOPs): Having SOPs can improve the consistency and quality of an agency's FOIA process. In addition, describing an agency's standard practices for handling FOIA requests on agency FOIA websites can help requesters better understand how their request will be handled.

a) Does your agency have SOPs that outline general processes for handling FOIA requests and appeals?

Yes. Currently, there are internal FOIA SOPs for Headquarters that need to be updated. Headquarters made some minor changes to its current SOP in FY 16, but a full revision of a single SOP for the agency is expected in FY21. HUD Region 6, based in Fort Worth, Texas, has a current SOP dated May 2019 that is being used for FOIA processes. And HUD Region 9, based in San Francisco, has implemented an SOP for FOIA.

b) If not, does your agency have plans to create FOIA SOPs? There are plans to update the current SOP for Headquarters and Regional/Field Offices.

c) If yes, how often are they reviewed/updated to account for changes in law, best practices, and technology? HUD has begun reviewing all FOIA processes Departmentwide and plans to update its SOPs this fiscal year upon completion of the review process.

d) In addition to having SOPs, does your agency post or otherwise describe your standard processes for handling requests on your website?

HUD plans to post its FOIA SOPs for Headquarters and the Regions to its website in FY21.

5. The FOIA Improvement Act of 2016 requires additional notification to requesters about the services provided by the agency's FOIA Public Liaison. Please provide an estimate of the number of times requesters sought assistance from your agency's FOIA Public Liaison during FY 2020 (please provide a total number or an estimate of the number). 4

6. Does your agency frequently receive common categories of first-party requests? If so, please describe the types of requests and if your agency has explored establishing alternative means of access to these records outside of the FOIA process?

Yes. The types of first-party requests are requests for mortgage loan information, personnel records, hiring decisions, and complaint decisions. HUD has not explored establishing alternative means to access such records outside of the FOIA process.

7. The FOIA Improvement Act of 2016 required all agencies to update their FOIA regulations within 180 days. Has your agency updated its FOIA regulations in accordance with the FOIA Improvement Act of 2016? Yes

If not, what is your agency's plan to update your regulations?
N/A

8. Please explain how your agency worked to mitigate the impact of the COVID-19 pandemic on FOIA processing. Examples could include, but are not limited to: altering workflows, implementing new technology, providing notices and instructions or otherwise communicating directly with requesters.

Prior to agency mandatory telework due to COVID 19, the Office of General Counsel, Administrative Law Division fortuitously revised the FOIA legal clearance process so that the submission for legal clearance and the legal clearance review are all conducted and tracked electronically and does not require a physical file or physical contact.

When mandatory telework was implemented due to the pandemic, HUD updated its technology to ensure that all employees could access the FOIA management system without incident. In addition, HUD posted a notice regarding the delay that COVID-19 may have on the processing of FOIA requests. HUD's Office of the Chief Information Officer provided tips on connecting the laptops to home monitors and televisions and on downloading large files from the HUD computer system to the FOIA management system. Employees were also instructed on how to forward their office telephone calls to their home phones.

The HUD Information Technology Services (HITS) Help Desk, a phone-based help service that operates each workday, has been readily available to help employees solve their IT-related problems. To solve difficult problems, employees can easily temporarily transfer their computer's controls to the Help Desk. During the pandemic, FOIA staff reported few problems with accessing HUD applications, and the contract team that manages the FOIA management system has been helpful in resolving any FOIA-related software issues.

9. Optional -- Please describe:

Best practices used to ensure that your FOIA system operates efficiently and effectively.

The FOIA Branch Chief is in continuous communication with FOIA management system contractor personnel and meetings are held at least twice a month to address any current or potential reporting issues, user access, or technical issues that may occur as well as to discuss potential updates to the system that would help enhance reporting capabilities.

Any challenges your agency faces in this area.

There are no current challenges to report.

Section III: Steps Taken to Increase Proactive Disclosures

The Department of Justice has long focused on the need for agencies to work proactively to post information online without waiting for individual requests to be received.

Please answer the following questions to describe the steps your agency has taken to increase the amount of material that is available on your agency websites. In addition to the questions below, you should also describe any additional steps taken by your agency to make and improve proactive disclosures of information.

1. Provide examples of any material that your agency has proactively disclosed during the past reporting year, including records that have been requested and released three or more times in accordance with 5 U.S.C. § 552(a)(2)(D). Please include links to these materials as well.

Many of HUD's program office staff continued to proactively post information to HUD's external website about HUD's programs and operations as required by the FOIA, thereby providing the public with immediate access to information without having to request it under the FOIA. That includes, but is not limited to, posting of the following this reporting cycle:

- 26 HUD funding opportunities from FY20.
<https://www.grants.gov/web/grants/search-grants.html?keywords=hud>
- 31 FY20 HUD notices of funding availability.
https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps
- Federal Housing Administration multifamily loans Firm Commitments and Endorsements Historical Database (FY06-FY20).
https://www.hud.gov/program_offices/housing/mfh/mfdata/mfproduction
- Multifamily assistance and Section 8 contracts that have been updated into FY21.
https://www.hud.gov/program_offices/housing/mfh/exp/mfhdiscl

2. Beyond posting new material, is your agency taking steps to make the posted information more useful to the public, especially to the community of individuals who regularly access your agency's website?

HUD is reviewing its current processes for ways to increase proactive disclosure and is strongly considering revising the way requests are assigned to specialists to enhance their knowledge about specific HUD programs. One of our goals in doing so is to more readily identify records that are likely to be of interest to the public.

3. If yes, please provide examples of such improvements. In particular, please describe steps your agency is taking to post information in open, machine-readable, and machine-actionable formats, to the extent feasible. If not posting in open formats, please explain why and note any challenges. N/A

4. Optional -- Please describe:

Best practices used to improve proactive disclosures.

Any challenges your agency faces in this area.

Limited staffing

Section IV: Steps Taken to Greater Utilize Technology

A key component of FOIA administration is using technology to make information more accessible. In addition to using the internet to make proactive disclosures, agencies should also be exploring ways to utilize technology in responding to requests.

Please answer the following questions to describe how your agency is utilizing technology to improve its FOIA administration and the public's access to information. You should also include any additional information that describes your agency's efforts in this area.

1. Please briefly describe the types of technology your agency uses to support your FOIA program. In addition, please highlight if your agency is leveraging or exploring any new technology that you have not previously reported. If so, please describe the type of technology.

FOIAXpress is the software system used to manage FOIA cases. HUD is working with its contractor to identify additional ways that the system may track and/or label frequently requested records.

2. OIP issued guidance in 2017 encouraging agencies to regularly review their FOIA websites to ensure that they contain essential resources and are informative and user-friendly. Has your agency reviewed its FOIA website(s) during the reporting period to ensure it addresses the elements noted in the guidance?

HUD has conducted limited review of its FOIA website this reporting period due to staff shortages and resources. GAO engaged with HUD this past fiscal year to conduct a review to see if the policies and procedures were aligned with FOIA statutes and DOJ

guidance to ensure HUD was in compliance with the FOIA regarding proactive disclosures.

3. Did your agency successfully post all four quarterly reports for Fiscal Year 2020?

Yes. All four quarterly reports can be found at https://www.hud.gov/program_offices/administration/foia/foiarpts.

4. If your agency did not successfully post all quarterly reports, with information appearing on FOIA.gov, please explain why and provide your agency's plan for ensuring that such reporting is successful in Fiscal Year 2021.

N/A

5. The FOIA Improvement Act of 2016 requires all agencies to post the raw statistical data used to compile their Annual FOIA Reports. Please provide the link to this posting for your agency's Fiscal Year 2019 Annual FOIA Report and, if available, for your agency's Fiscal Year 2020 Annual FOIA Report.

HUD's 2019 and 2020 Annual FOIA Report, as well as the underlying raw statistical data, can be found at https://www.hud.gov/program_offices/administration/foia/foiarpts. The raw data reports are found under "HUD's Raw Data Annual Report" as .XLM files and are broken down by year.

6. Optional -- Please describe:

Best practices used in greater utilizing technology
Any challenges your agency faces in this area

HUD has faced significant challenges with its use of electronic discovery (eDiscovery) record collection. Due to the prevalence of requests seeking email and calendar records, particularly from politically appointed agency leadership, the FOIA Branch has submitted a significant number of eDiscovery search requests. This has led to a backlog within our eDiscovery system, with current turnaround times of more than 5 months to one year. While we trust this system for its objectivity and thoroughness, the tradeoff has been in our inability to collect records efficiently. The eDiscovery capacity issues are compounded because a single system and contractor handles data requests for litigation, OIG, and other business requirements.

Section V: Steps Taken to Improve Timeliness in Responding to Requests and Reducing Backlogs

The Department of Justice has emphasized the importance of improving timeliness in responding to requests. This section of your Chief FOIA Officer Report addresses both time limits and backlog reduction. Backlog reduction is measured both in terms of numbers of backlogged

requests or appeals and by looking at whether agencies closed their ten oldest requests, appeals, and consultations.

For the figures required in this Section, please use the numbers contained in the specified sections of your agency's FY 2019 and 2020 Annual FOIA Reports.

A. Simple Track

Section VII.A of your agency's Annual FOIA Report, entitled "FOIA Requests – Response Time for All Processed Requests," includes figures that show your agency's average response times for processed requests. For agencies utilizing a multi-track system to process requests, there is a category for "simple" requests, which are those requests that are placed in the agency's fastest (non-expedited) track, based on the low volume and/or simplicity of the records requested.

1. Does your agency utilize a separate track for simple requests?

Yes.

2. If your agency uses a separate track for simple requests, according to Annual FOIA Report section VII.A, was the agency overall average number of days to process simple requests twenty working days or fewer in Fiscal Year 2020?

No. HUD's overall average number of days to process simple requests was 52.87 days.

3. Please provide the percentage of requests processed by your agency in Fiscal Year 2020 that were placed in your simple track. Please use the following calculation based on the data from your Annual FOIA Report: (processed simple requests from Section VII.C.1) divided by (requests processed from Section V.A.) x 100.

81% (1,485 simple requests/1,834 total requests) Please note: HUD believes this percentage is not an accurate representation of the volume and categorization of simple requests. HUD collects this data from the FMS2 system. The categorization of the type of FOIA in FMS2 is skewed towards the "Simple" type (versus "Complex") by the initial FOIA processor due to the inadequate understanding by the processor of the distinction between Simple and Complex in this field in the FMS2 system. HUD intends on providing more specific training to FOIA processors regarding this field to ensure more appropriate and accurate FOIA type categorization is captured in FMS2.

4. If your agency does not track simple requests separately, was the average number of days to process all non-expedited requests twenty working days or fewer?

N/A

B. Backlogs

Section XII.A of your agency's Annual FOIA Report, entitled "Backlogs of FOIA Requests and Administrative Appeals" shows the numbers of any backlogged requests or appeals from the fiscal year. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2019 and Fiscal Year 2020 when completing this section of your Chief FOIA Officer Report.

BACKLOGGED REQUESTS

5. If your agency had a backlog of requests at the close of Fiscal Year 2020, according to Annual FOIA Report Section XII.A, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2019?

No. HUD's backlog increased from 932 at the end of FY19 to 1,128 at the end of FY20.

6. If not, according to Annual FOIA Report Section V.A, did your agency process more requests during Fiscal Year 2020 than it did during Fiscal Year 2019?

No. HUD processed 2,018 requests in FY19, and 1,834 requests in FY20.

7. If your agency's request backlog increased during Fiscal Year 2020, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

An increase in the number of incoming requests. Loss of staff.

An increase in the complexity of the requests received. If possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase.

The Department's increase in its backlog can also be attributed to:

- Increases in the use and need for eDiscovery data collections and searches in order to conduct an adequate search for litigation cases.
- FOIA requests in litigation since litigation cases can be ongoing for many months to years.
- Engagement of the submitter notice process.
- A loss of staff; in particular, seasoned, and knowledgeable Government Information Specialists.

As noted above in IV.6, the Department faced resource issues with its use of the eDiscovery tool to meet the agency's requirement to conduct an adequate search for litigation cases. Due to the number of requests in the eDiscovery queue, and the use of the system for other non-FOIA purposes, turnaround times for the collection of records increased from approximately 5 months to well over a year. The eDiscovery system is a sequential processing system so as a result, processing of FOIA requests often becomes stuck behind higher priority actions in the sequential queue. OGC has engaged in

discussions with OCIO on ways to streamline and enhance the technical processing capacity of the system.

Any other reasons – please briefly describe or provide examples when possible.

8. If you had a request backlog, please report the percentage of requests that make up the backlog out of the total number of requests received by your agency in Fiscal Year 2020. Please use the following calculation based on data from your Annual FOIA Report: (backlogged requests from Section XII.A) divided by (requests received from Section V.A) x 100. If your agency has no request backlog, please answer with “N/A.”

55% (1,128 requests in backlog at end of FY20, 2,038 requests received in FY20)

BACKLOGGED APPEALS

9. If your agency had a backlog of appeals at the close of Fiscal Year 2020, according to Section XII.A of the Annual FOIA Report, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2019?

There were no appeals in the backlog at the end of FY19 or FY20.

10. If not, according to section VI.A of the Annual FOIA Report, did your agency process more appeals during Fiscal Year 2020 than it did during Fiscal Year 2019?

Yes. HUD processed 68 FOIA appeals in FY20 versus 54 FOIA appeals in FY19.

11. If your agency’s appeal backlog increased during Fiscal Year 2020, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

N/A

12. If you had an appeal backlog, please report the percentage of appeals that make up the backlog out of the total number of appeals received by your agency in Fiscal Year 2020. Please use the following calculation based on data from your Annual FOIA Report: (backlogged appeals from Section XII.A) divided by (appeals received from Section VI.A) x 100. If your agency did not receive any appeals in Fiscal Year 2020 and/or has no appeal backlog, please answer with "N/A."

N/A

C. Backlog Reduction Plans

13. In the 2020 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1,000 requests in Fiscal Year 2019 was asked to provide a plan for achieving

backlog reduction in the year ahead. Did your agency implement a backlog reduction plan last year? If so, describe your agency's efforts in implementing this plan and note if your agency was able to achieve backlog reduction in Fiscal Year 2020?

HUD's FOIA backlog at the end of FY19 was 932. The backlog reduction plan was drafted but not yet implemented.

14. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2020, please explain your agency's plan to reduce this backlog during Fiscal Year 2021.

We are working within our budget to obtain additional full-time employees and contract support to allow us to increase our focus on reducing the age of open requests and improve response time for simple requests. Such additions would also enhance our ability to proactively post and track frequently requested documents and better track a wealth of information that is already being posted to the Department's website by its program staff.

D. Status of Oldest Requests, Appeals, and Consultations

Section VII.E, entitled "Pending Requests – Ten Oldest Pending Requests," Section VI.C.(5), entitled "Ten Oldest Pending Administrative Appeals," and Section XII.C., entitled "Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending at Your Agency," show the ten oldest pending requests, appeals, and consultations. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2019 and Fiscal Year 2020 when completing this section of your Chief FOIA Officer Report.

OLDEST REQUESTS

15. In Fiscal Year 2020, did your agency close the ten oldest pending perfected requests that were reported in Section VII.E. of your Fiscal Year 2019 Annual FOIA Report?

No.

16. If no, please provide the number of these requests your agency was able to close by the end of the fiscal year, as listed in Section VII.E of your Fiscal Year 2019 Annual FOIA Report. If you had fewer than ten total oldest requests to close, please indicate that.

In FY20, HUD closed four of the ten oldest requests reported at the end of FY19.

17. Beyond work on the ten oldest requests, please describe any steps your agency took to reduce the overall age of your pending requests.

When a received request was broadly worded, voluminous, or appeared to be especially difficult to search, FOIA specialists were encouraged to engage in early and consistent dialogue with the requester; for example, by clarifying the request, explaining the

capabilities and limitations of the Department's collection and review processes, and asking the requester to consider altering or reducing the scope of their original request. Maintaining open lines of communication with requesters while processing FOIA requests has helped to facilitate better understanding and greater cooperation.

TEN OLDEST APPEALS

18. In Fiscal Year 2020, did your agency close the ten oldest appeals that were reported pending in Section VII.C.5. of your Fiscal Year 2019 Annual FOIA Report?

Yes.

19. If no, please provide the number of these appeals your agency was able to close by the end of the fiscal year, as listed in Section VII.C.(5) of your Fiscal Year 2019 Annual FOIA Report. If you had fewer than ten total oldest appeals to close, please indicate that.

All FOIA Appeals were handled within the statutory timeframe.

20. Beyond work on the ten oldest appeals, please describe any steps your agency took to reduce the overall age of your pending appeals.

The FOIA Branch generates weekly reporting that includes thorough information about FOIA appeals and litigation, ensuring that both FOIA staff and appropriate agency leadership are made aware of pending appeals.

TEN OLDEST CONSULTATIONS

21. In Fiscal Year 2020, did your agency close the ten oldest consultations that were reported pending in Section XII.C. of your Fiscal Year 2019 Annual FOIA Report?

Yes.

22. If no, please provide the number of these consultations your agency was able to close by the end of the fiscal year, as listed in Section XII.C. of your Fiscal Year 2019 Annual FOIA Report. If you had fewer than ten total oldest consultations to close, please indicate that.

N/A

E. Additional Information on Ten Oldest Requests, Appeals, and Consultations & Plans

23. Briefly explain any obstacles your agency faced in closing its ten oldest requests, appeals, and consultations from Fiscal Year 2019.

Two of the most significant obstacles HUD has faced in closing its ten oldest requests are FOIA staffing and limited technological capacity. HUD currently has approximately 131

FOIA requests submitted by the FOIA Branch awaiting eDiscovery searches. Our submission system has been at capacity for over a year, and new submissions are often scheduled for more than 5 months to a year from the date of receipt. The scheduled date for completion of eDiscovery searches is based on the Service Level Agreements in the contract and the overall capacity. In general, with each receipt of a request that requires an eDiscovery search, and given the FOIA Branch's reduction in seasoned staff in FY20 to process such requests, the more the eDiscovery case backlog has increased. OGC has engaged in discussions with OCIO on ways to streamline and enhance technical capacity.

24. If your agency was unable to close any of its ten oldest requests because you were waiting to hear back from other agencies on consultations you sent, please provide the date the request was initially received by your agency, the date when your agency sent the consultation, and the date when you last contacted the agency where the consultation was pending.

One of HUD's ten oldest requests falls under these parameters. HUD received the request in question on November 18, 2015. HUD sent a consultation letter on February 18, 2020, and last contacted the other agency on January 12, 2021.

25. If your agency did not close its ten oldest pending requests, appeals, or consultations, please provide a plan describing how your agency intends to close those "ten oldest" requests, appeals, and consultations during Fiscal Year 2021.

HUD plans to have a more focused view of those oldest pending FOIA requests and will set timelines on when they should be closed.

F. Success Stories

Out of all the activities undertaken by your agency since March 2020 to increase transparency and improve FOIA administration, please briefly describe here at least one success story that you would like to highlight as emblematic of your agency's efforts. The success story can come from any one of the five key areas but should not be something that you have reported in a prior year. As noted above, OIP will highlight these agency success stories during Sunshine Week. To facilitate this process, all agencies should use bullets to describe their success story and limit their text to a half page. The success story is designed to be a quick summary of key achievements. A complete description of all your efforts will be contained in the body of your Chief FOIA Officer Report.

We have none to highlight for this reporting period.