



FY 2020
Affirmative Action Plan

*Recruitment, Hiring, Advancement,
and Retention of Persons with
Disabilities*

PART J

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

**Affirmative Action Plan
for the Recruitment, Hiring, Advancement, and
Retention of Persons with Disabilities**

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Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer: No
- b. Cluster GS-11 to SES (PWD) Answer: Yes

Response: The representation rate for PWD in the GS-11 to SES grade level cluster was 11.05%, which is 0.95% below the 12.00% goal.

2. Using the goal of 2.00% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- c. Cluster GS-1 to GS-10 (PWTD) Answer: No
- d. Cluster GS-11 to SES (PWTD) Answer: No

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

Response: HUD adopted the federal goal of 12.00% as the participation rate benchmark for PWD and 2.00% for PWTD. HUD's commitment to this numerical goal is expressed not only in the annual MD-715 reports but is reiterated to hiring managers and/or recruiters by HUD senior leadership.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. Plan To Provide Sufficient and Competent Staffing For Disability Program

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer: Yes

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Shirley Robinson Selective Placement Coordinator OCHCO shirley.v.robinson@hud.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Shirley Robinson Selective Placement Coordinator OCHCO
Processing reasonable accommodation requests from applicants and employees	4	0	0	Erica M. Jones, Reasonable Accommodation Branch Chief, OCHCO erica.m.jones@hud.gov
Section 508 Compliance	0	1	40	Jeffrey Salit, Section 508 Coordinator, OCIO jeffrey.l.salit@hud.gov
Architectural Barriers Act Compliance	0	0	9	Jeanine M. Worden, ABA Coordinator, OGC jeanine.m.worden@hud.gov

Special Emphasis Program for PWD and PWTD	1	0	0	Patrice Wilson EEO Specialist, ODEEO patrice.l.wilson@hud.gov
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	4	0	0	Jeffrey Salit, Section 508 Coordinator, OCIO jeffrey.l.salit@hud.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

Response: The Recruitment and Staffing Division (RSD) has taken and will continue to take various training by the Office of Personnel Management on Strategies and Resources for Recruiting, Hiring, and Retaining People with Disabilities/Targeted Disabilities.

B. Plan To Ensure Sufficient Funding For The Disability Program

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

Response: HUD continues to provide sufficient support and resources to its Disability Employment Program.

Section III: Program Deficiencies in the Disability Program

FEDSEP will provide the program deficiencies from the current Part G. If there are no program deficiencies, please state “The agency has not reported any program deficiencies involving the disability program.”

Program Deficiencies

Objectives: Establish a system to track, analyze, and evaluate reasonable accommodation requests of HUD employees.

Accomplishments: HUD received EEOC approval of its Reasonable Accommodation Program policies and procedures, which are currently pending union negotiations. Upon completion and CBA execution, they will be posted on the HUD.gov website. User manual for Reasonable Accommodation Portal is under development. Target date for implementation of Reasonable Accommodation Portal is by December 31, 2021.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

A. Plan To Identify Job Applicants With Disabilities

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

Response: RSD is working on a strategic recruitment plan that will increase the use of the Schedule A appointment authority to hire PWD and PWTD in HUD. In addition, the Pathways Program will be an additional source to hire students with a disability.

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

Response: HUD utilizes a variety of activities to increase the participation rates of PWD and PWTDs, to include partnering with Gallaudet University, the Operation Warfighter's program for disabled Veterans, and State Vocational Rehabilitation Centers to recruit and hire qualified PWD and PWTD. In addition, HUD uses the U.S. Department of Labor's (DOL) Workforce Recruitment Program (WRP), which connects Federal employers with college students and recent graduates with disabilities eager to enter the workplace and the Schedule A appointing authority, Pathways, and various Veterans appointing authorities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Response: First, HUD verifies the appropriate proof of disability supporting documentation issued by licensed medical professionals, vocational rehabilitation specialist or any Federal or state agency to determine eligibility. Eligible applicants are then forwarded either by review of the POL for anticipated positions or at the request of a Program Office for consideration. All eligible applicants are referred on a separate certificate following review. Selecting officials receive quarterly training on how Schedule A hiring authority can be used and an additional overview when reviewing an applicant for consideration using the Schedule A authority. In addition, a new Schedule A resume database on SharePoint has been established to give hiring managers easy access to review resumes from PWD for employment opportunities.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer: Yes

Response: HUD provides ad-hoc training to all Program Office hiring managers and Administrative Officers on hiring authorities and practices to increase HUD's use of the

Schedule A hiring authority and Veterans recruitment programs. This training is provided virtually to include field managers and to accommodate the workplace during the pandemic.

B. Plan To Establish Contacts With Disability Employment Organizations

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

Response: HUD utilizes DOL’s Workforce Recruitment Program (WRP), Gallaudet University, and other resources to recruit and hire PWD and PWTD. In addition, HUD continues to partner with state Vocational Rehabilitative Services to promote future hiring opportunities for PWD and PWTD working closely and partnering with University Student Disability Affairs Offices.

C. Progression Towards Goals (Recruitment And Hiring)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

New Hires for Permanent Workforce (PWD)	Answer: No
New Hires for Permanent Workforce (PWTD)	Answer: No

Response: No triggers existed in FY 2020 for PWD and PWTD among the new hires in the permanent workforce. HUD exceeded the Federal government wide 12% goal for PWD (17.81%) and the 2% goal for PWTD at 3.11%.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

New Hires for MCO (PWD)	Answer: No
New Hires for MCO (PWTD)	Answer: Yes

Response: In FY 2020, no triggers existed for PWD among hires in MCOs in HUD, however, PWTD did not reach the 2% goal the MCO 0301. The participation rate for MCO 0301 was 0.90%, which is 1.10% below the federal benchmark.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

Qualified Applicants for MCO (PWD)	Answer: Yes
Qualified Applicants for MCO (PWTD)	Answer: Yes

Response: In FY 20, HUD’s MCO triggers existed for job series 0301 CPD Specialist (PWD and PWTD), 0360 EO Specialist (PWTD) and 1101 Housing Specialist (PWTD).

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

Promotions for MCO (PWD)	Answer: No
Promotions for MCO (PWTD)	Answer: No

Response: N/A

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for persons with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for persons with disabilities.

A. Advancement Program Plan

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Response: HUD utilizes its annual MD-715 Report and Diversity and Inclusion Strategic Plan to develop and implement initiatives to ensure PWD have sufficient opportunities for advancement. HUD promotes the flexibilities of Schedule A hiring for internal and external candidates during weekly consultation meetings and utilizes a recruitment strategy that includes outreach and recruitment for Schedule A applicants.

B. Career Development Opportunities

1. Please describe the career development opportunities that the agency provides to its employees.

Response: In FY 2020, OCHCO conducted 203 training events. In addition, we provided onsite, in-person training to three Field Offices (Knoxville, TN, New Orleans, LA, and Anchorage, AK).

2. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Applicants (PWD)	Answer: Yes
b. Selections (PWD)	Answer: Yes

Response: Triggers exist for PWD for applicants and selectees for HUD’s career development programs. Specifically, at the GS 5-12 levels only 3.90% of applicants and selectees were PWD; at the GS 13-14 levels only 4.10% of applicants and selectees were PWDs; and at the GS-15 and SES levels there were no PWD applicants or selectees.

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Applicants (PWTD) Answer: Yes
- b. Selections (PWTD) Answer: Yes

Response: Triggers exist for PWTDs for applicants and selectees for HUD’s career development programs. Specifically, at the GS 5-12 levels only 0.90% of applicants and selectees were PWTDs; at the GS 13-14 levels only 0.40% of applicants and selectees were PWTDs; and at the GS-15 and SES levels only 1.90% of applicants and selectees were PWTDs.

C. Awards

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer: Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer: Yes

Response: In FY 2020, HUD identified triggers for awards, bonuses, and incentives based on the inclusion rate for PWD (1.56%) as compared to all others (1.84%) and PWTD (1.67%) as compared to all others (1.82%).

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer: No
- b. Pay Increases (PWTD) Answer: No

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer: No
- b. Other Types of Recognition (PWTD) Answer: No

D. Promotions

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: No

Response: SES Internal Applicants NO; Internal Selections NO. In FY 2020, HUD’s internal promotion rate at the GS-15 level for PWTD was 1.30%. When compared to the appropriate benchmarks, triggers were not identified for qualified internal applicants.

b. Grade GS-15

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: Yes

Response: GS-15 Internal Applicants NO; Internal Selections Yes. In FY 2020, HUD’s internal promotion rate at the GS-15 level for PWTDs was 1.30%. When compared to the appropriate benchmarks, triggers were not identified for qualified internal applicants.

c. Grade GS-14

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: Yes

Response: GS-14 Internal Applicants NO; Internal Selections YES. In FY 2020, HUD’s internal promotion rate at the GS-15 level for PWTD was 3.65%. When compared to the appropriate benchmarks, triggers were not identified for internal selections.

d. Grade GS-13

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: No

Response: GS-13 Internal Applicants NO; Internal Selections NO. In FY 2020, HUD’s internal promotion rate at the GS-13 level for PWTDs was 4.35%. When compared to the appropriate benchmarks, triggers were not identified for both qualified internal applicants and internal selections.

2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

Response: In FY 2020, when compared to the appropriate benchmark, no triggers were identified for new hires from grade levels GS-13 through SES.

b. Grade GS-15

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

Response: N/A

c. Grade GS-14

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

Response: N/A

d. Grade GS-13

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

Response: N/A

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- a. New Hires to SES (PWD) Answer: No
- b. New Hires to GS-15 (PWD) Answer: No
- c. New Hires to GS-14 (PWD) Answer: No
- d. New Hires to GS-13 (PWD) Answer: No

Response: N/A

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD's among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- a. New Hires to SES (PWTD) Answer: No
- b. New Hires to GS-15 (PWTD) Answer: No
- c. New Hires to GS-14 (PWTD) Answer: No
- d. New Hires to GS-13 (PWTD) Answer: No

Response: N/A

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: No

b. Managers

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: No

c. Supervisors

- I. Qualified Internal Applicants (PWD) Answer: No
- II. Internal Selections (PWD) Answer: No

Response: In FY 2020, when compared to the appropriate benchmarks, no triggers were identified for promotions to supervisory positions for executives (qualified internal applicants and internal selections) and managers (internal selections). Additionally, HUD did not capture this data on supervisors.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

- a. New Hires for Executives (PWTD) Answer: No
- New Hires for Managers (PWTD) Answer: No
- New Hires for Supervisors (PWTD) Answer: No

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

b. Managers

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

c. Supervisors

- I. Qualified Internal Applicants (PWTD) Answer: No
- II. Internal Selections (PWTD) Answer: No

Response: N/A

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- a. New Hires for Executives (PWD) Answer: No
- b. New Hires for Managers (PWD) Answer: No
- c. New Hires for Supervisors (PWD) Answer: No

Response: In FY 2020, when compared to the benchmark, a trigger was identified for new hires to supervisory positions for executives. Additionally, HUD did not capture this data on supervisors.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- a. New Hires for Executives (PWTD) Answer: No
- b. New Hires for Managers (PWTD) Answer: No
- c. New Hires for Supervisors (PWTD) Answer: No

Response: N/A

Section VI: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

A. Voluntary And Involuntary Separations

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102 (u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer: Yes

Response: N/A

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWD) Answer: No
- b. Involuntary Separations (PWD) Answer: No

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWTD) Answer: No
- b. Involuntary Separations (PWTD) Answer: No

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Response: N/A

B. Accessibility Of Technology And Facilities

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b)), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151 – 4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

Response: HUD.gov

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

Response: <https://www.access-board.gov/enforcement/>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

Response: N/A

C. Reasonable Accommodation Program

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

Response: HUD's average time frame for processing requests for reasonable accommodations in FY 20 was approximately 55 days. Approximately 52% of cases were processed within 30 business days. Upon finalization of negotiations and execution of new Collective Bargaining Agreements, as applicable, HUD will establish an updated Reasonable Accommodation Program policy that clearly states the maximum amount of time for processing requests for reasonable accommodation.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation request for trends.

Response: HUD received final approval of its Reasonable Accommodation Program policy. Upon finalization of negotiations with one HUD union and execution of a new Collective Bargaining Agreement, HUD will establish the Reasonable Accommodation Program policy that complies with EEOC regulations and guidance.

D. Personal Assistance Services Allowing Employees To Participate In The Workplace

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency. Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS request for trends.

Response: HUD updated its Reasonable Accommodation Program policy to include the implementation of EEOC's Personal Assistance Services (PAS) requirement. Requests for PAS follow the same process as outlined in HUD Handbook 7855.1, *Accommodation Request for Persons with Disabilities*. The policy outlines the process for requesting PAS, determining whether such services are required, and the agency's right to deny such requests when provision of the services would pose an undue hardship, which are the same as for reasonable accommodation. The updated Reasonable Accommodation Program policy completed HUD's internal clearance process, was submitted to the EEOC for review, and received EEOC concurrence. HUD has not yet received any requests for PAS but has a contractor in place to ensure that PAS will be made available when needed. HUD will utilize this report to measure its progress on PAS and all other matters impacting PWTB's.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Answer: Yes

Response: The total number of formal EEO complaints for FY 2020 was 64. Of the 64 formal EEO complaints, 23 complaints were filed by PWD alleging harassment (36.00%), which exceeded the government wide average of 21.00%. (NOTE: This percentage is based on FY 2019 government wide average numbers as the EEOC has not released the numbers for FY 2020 as of the preparation of this response.)

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer: No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

Response: There were no findings of discrimination relative to this request during FY 2020.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer: Yes

Response: Of the 64 formal EEO complaints filed in FY 2020, 16 alleged a failure to provide a reasonable accommodation (25.00%), which exceeded the government wide average of 13.00%. (Please see note above relative to EEOC's release of the government wide average.)

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodations result in a finding of discrimination or a settlement agreement?

Answer: No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Response: There were no findings of discrimination relative to this request during FY 2020.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer: No

Response: To date, HUD has not identified any barriers that affect employment opportunities for PWD and/or PWTD. FY 2020 HUD established a plan to conduct barrier analysis for identified triggers.

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer: No

Response: To date, HUD has not identified any barriers that affect employment opportunities for PWD and/or PWTD. However, in FY 2020 HUD began a review of data and created an initial plan to conduct barrier analysis for identified triggers. Upon the identification of barriers, HUD will create a plan to correct the barriers.

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1: HUD's non-compliance in establishing and maintaining an effective Reasonable Accommodation Program that complies with the governing laws and principles that require Federal agencies to establish procedures to facilitate the provisions of reasonable accommodations.

Further, HUD received a notice of deficiency in this area from EEOC in a technical assistance letter dated July 6, 2017.

Barrier(s): HUD has not trained employees their responsibilities under the Department's reasonable accommodation process and procedures. In addition, HUD lacked a web-based tracking system that manages the reasonable accommodation process.

Objective(s):

- Finalize HUD's Reasonable Accommodation Policies and Procedures, incorporating feedback from EEOC and formalizing communications outlining responsibilities.
- Comply with the EEOC's updated regulations concerning implementation of Section 501 of the Rehabilitation Act of 1973.
- Train employees and supervisor on the reasonable accommodation process and disseminate such procedures during new employee orientations and periodic employee and supervisor training sessions and make reasonable accommodation procedures available via HUD's HUD@Work (Intranet Website) and www.hud.gov (External Website).

Responsible Official(s):

Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA) and Director, Office of Departmental Equal Employment Opportunity (ODEEO)

Performance Standards Address the Plan? (Yes or No): Yes

Target Date (mm/dd/yyyy): September 30, 2021

Planned Activities:

Publish the new Reasonable Accommodation program policy and procedures and identify	September 30, 2021
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substantive changes to provide increased transparency in the process and clearly articulate roles and responsibilities.	
Disseminate the recently approved Reasonable Accommodation Program policy and procedures, upon execution of a CBA currently being negotiated.	September 30, 2021
Assess all reasonable accommodation request to determine what trends, commonalities, and/or barriers exist for immediate process improvements.	September 30, 2021
Offer Reasonable Accommodation policy and procedures training to all HUD employees.	September 30, 2021

Sufficient Staffing & Funding? (Yes or No): **Yes**

Modified Date (mm/dd/yyyy): 09/30/2019

Completion Date (mm/dd/yyyy): **TBD**

Fiscal Year: 2020

Accomplishments:

- HUD received EEOC approval of draft Reasonable Accommodation Program policies and procedures, which includes the implementation of EEOC’s Personal Assistance Services (PAS) requirement. HUD’s Reasonable Accommodation Program policies and procedures will be disseminated upon the completion of union negotiations and CBA execution.
- All HUD supervisors were offered Reasonable Accommodation training.
- HUD completed user acceptance testing on its new Reasonable Accommodation Portal to monitor, track, facilitate and report on reasonable accommodation case management. HUD’s Reasonable Accommodation Portal is an automated record-keeping system that securely stores information on reasonable accommodation requests, supporting documentation, dispositions, decisions, appeals, and implementation. It also facilitates initial reasonable accommodation requests or requests for modifications and will provide information to enhance accountability for

timely and appropriate responses to reasonable accommodations requests. The new Reasonable Accommodation Portal was targeted for FY 2020 implementation, however, it was delayed.

- HUD is collaborating with the EEOC to develop a new training module for supervisors and managers regarding reasonable accommodation. The module agenda was developed, and delivery was targeted for FY 2020, however, it was delayed.

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Response: HUD's dissemination of its Reasonable Accommodation policy was delayed because it is currently negotiating a new CBA with one union, including a Reasonable Accommodation article, and wants to ensure consistency between the documents prior to dissemination.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Response: The EEOC's approval of HUD's Reasonable Accommodation Procedures, and anticipated dissemination, will raise awareness and enhance transparency for HUD employees of the reasonable accommodation process.

Trigger 2: In FY 2020, HUD's representation of PWD was 11.64% (882) of the total permanent workforce (7,575), slightly below the Federal government-wide goal of 12.00%. Additionally, HUD's FY 2020 participation rate of PTWD was 2.75% (208) of the total permanent workforce, exceeding the Federal government-wide goal of 2.00%.

Barrier(s): There appears to be a lack of awareness on the part of hiring managers of the special hiring authorities that could be used to non-competitively hire individuals with targeted disabilities and of established organizations whose mission is to assist Federal agencies in finding qualified candidates with disabilities.

HUD continues to make significant progress towards meeting the overall goal of 12.00% PWD with an increase of 0.39% from FY 2019 participation. Once again, HUD exceeded the PWTD participation goal of 2.00%. As such, systemic barriers are minimal, and HUD is shifting to continuous expansion of education of managers regarding hiring authorities, recruitment, retention, advancement, and reasonable accommodation programs to further its goals.

Objective(s): Continue to improve recruitment, outreach, and retention efforts of PWD and PWTD.

Responsible Official(s):

Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)

Performance Standards Address the Plan? (Yes or No): Yes

Target Date (mm/dd/yyyy): 09/30/2021

Planned Activities:

Establish HUD’s five-year goals/plans to increase the participation rates of PWD and PWTD to reach the government-wide goal.	September 30, 2021
Provide training to managers/supervisors on Schedule A Hiring Authorities.	September 30, 2021
Promote participation in HUD-wide related activities aimed at increasing the participation of PWD and PWTD.	September 30, 2021
Utilize OPM’s contract vendor and other resources to recruit and hire qualified PWD and PWTD.	September 30, 2021
Resurvey the HUD workforce every two years to update the disability (as well as race, ethnicity, gender, and veteran) codes in workforce data. This survey will be a voluntary self-identification and result in the creation of initiatives to address and eliminate potential barriers to recruitment/outreach, hiring, professional development, promotion, and retention of PWD.	September 30, 2021

Sufficient Staffing & Funding? (Yes or No): Yes

Modified Date (mm/dd/yyyy): 10/01/2019

Completion Date (mm/dd/yyyy): On-going

Fiscal Year: 2020

Accomplishments:

- HUD initiated efforts to conduct a Department wide self-identification campaign for employees by drafting a message for issuance to all HUD employees in FY 20. The self-identification campaign is designed to raise awareness of the importance of accurate self-identification, the uses of the data regarding HUD’s PWD and PWTD participation rates, and the ability of HUD employees to review and, if appropriate, change their self-identification.
- HUD conducted a Focus Group on Evacuation Procedures for PWD to understand experiences, address concerns and ensure the effectiveness of evacuation procedures for

PWD. HUD is committed to ensure that PWD and PWTD who require evacuation assistance are aware of the procedures and provided with assistance in the event of an emergency.

- HUD continues to offer a variety of training programs and courses to HUD supervisors and employees regarding disability laws and requirements, including *Harmony and Respect at HUD: Civility Matters*.
- HUD continues to provide easy access in requesting assistive technology through its Assistive Technology Program for accommodating HUD employees with visual, hearing, mobility, cognitive, or other impairments. HUD also continued its Interpreter Services program to provide sign language/oral interpreting services to HUD employees who are deaf or hard of hearing.

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Response: HUD experienced personnel changes in key positions that delayed advancement of activities.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Response: The actual impacts of the completion of planned activities are wide ranging and will allow HUD to become an employer of choice for PWD and PWTD. HUD is proud that it exceeds the Federal government-wide participation goal for PWTD and continues to make positive progress to meeting the participation goal for PWD. Upon completion of the planned activities, HUD hopes to exceed the participation goals and firmly establish itself as a leader in the employment of PWD and PWTD.