

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

**EEOC MANAGEMENT DIRECTIVE
(MD) 715
FISCAL YEAR 2021**

Prepared By: Office of Departmental Equal Employment Opportunity (ODEEO)

U.S. Department of Housing and Urban Development

Table of Contents

Parts A – Dpage 3 - 5

- Part A: Department or Agency Identifying Information**
- Part B: Total Employment**
- Part C: Agency Official(s) Responsible for Oversight of EEO Program(s)**
- Part D: List of Subordinate Components/Supplemental Documentation**

Part E: Executive Summarypage 6

**Part F: Certification of Establishment of Continuing
Equal Employment Opportunity Programspage 22**

Part G: Agency Self-Assessment Checklist Measuring Essential Elementspage 23

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Programspage 61

Part I: EEO Plan to Eliminate Identified Barrierspage 76

**Part J: Special Program Plan for the Recruitment, Hiring, and Advancement
of Individuals with Targeted Disabilitiespage 81**

PART A: Department or Agency Identifying Information

Agency	2 nd level reporting component	Address City, State Zip Code	CPDF Code (xxxx)	FIPS Code
HUD		451 7 th Street, SW Washington, DC 20410	HU83	11001

PART B: Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Non-Appropriated Workforce	Total Workforce
Number of Employees	7,750	247	N/A	7,997

PART C: Agency Official(s) Responsible for Oversight of EEO Program(s)

Agency Leadership	Name	Title
Head of Agency Official	Marcia L. Fudge	Secretary, U.S. Department of Housing and Urban Development
Principal EEO Director/ Official Title/ Series/Grade	Wayne A. Williams Wayne.A.Williams@hud.gov	Director, Office of Departmental Equal Employment Opportunity (ODEEO), ES-0260-00
Title VII Affirmative EEO Program Official	[VACANT]	Director, Affirmative Employment Division, ODEEO, GS-0260-15
Section 501 Affirmative Action Program Official	Erica M. Jones Erica.M.Jones@hud.gov	(Acting) Director, EAP, Health and Wellness Division, Office of the Chief Human Capital Officer, Office of the Assistant Secretary for Administration, GS-0201-15
Complaint Processing Program Manager	Rodney M. Cox Rodney.M.Cox@hud.gov	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15
ADR Program Manager	Rodney M. Cox Rodney.M.Cox@hud.gov	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15
Principle MD-715 Preparer	Tonya P. Watson Tonya.P.Watson@hud.gov	Lead Equal Employment Opportunity Specialist, Affirmative Employment Division, ODEEO, GS-0260-14
Other Responsible EEO Staff	Patrice W. Dogbatse Patrice.W.Dogbatse@hud.gov	Equal Employment Opportunity Specialist, Federal Women’s Program Manager (FWPM),

Agency Leadership	Name	Title
		Affirmative Employment Division, ODEEO, GS-0260-13
Other Responsible EEO Staff	Jose A. Flores Jose.A.Flores@hud.gov	Equal Employment Opportunity Specialist, Hispanic Employment Program Manager (HEPM), Affirmative Employment Division, ODEEO, GS-0260-13
Other Responsible EEO Staff	Willie D. Tucker Willie.D.Tucker@hud.gov	Equal Employment Opportunity Specialist, Disability Employment Program Manager, Affirmative Employment Division, ODEEO, GS-0260-13

PART D1: List of Subordinate Components

Subordinate Component	City	State	CPDF Code (xxxx)	FIPS Code
None				

PART D2: Supplemental Documentation

Have the following mandatory documents been uploaded?	Please respond "Yes" or "No"	Comments
Agency's Strategic Plan 2018-2022	Yes	
Alternative Dispute Resolution Procedures	Yes	Currently finalizing the ADR Procedures; Anticipated release to the workforce is before the end of FY 2022. Until that time, procedures dated December 2020 remain in effect.
Anti-Harassment Policy and Procedures	Yes	Anti-Harassment Policy and Procedures is currently linked to on-going collective

Have the following mandatory documents been uploaded?	Please respond "Yes" or "No"	Comments
		bargaining agreement (CBA) negotiations. Procedures dated December 2020 remain in effect.
EEO Policy Statement	Yes	
Organizational Chart	Yes	
Personal Assistance Services Procedures	Yes	Included in the Reasonable Accommodation Procedures.
Reasonable Accommodation Procedures	Yes	

PART E: EXECUTIVE SUMMARY

AGENCY'S MISSION/VISION

The U.S. Department of Housing and Urban Development (HUD or Department) is a cabinet-level Department that employs approximately 8,000 employees in its Headquarters (HQ) and 10 Regional Offices. HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes. HUD's vision is to continually seek to improve the delivery of its programs and remain true to its mission to expand opportunities for those it is charged to serve.

Over the course of the next four years HUD will pursue two overarching priorities focused on increasing equity and improving customer experience across all HUD programs. Five strategic goals undergird the Plan as follows:

- Strategic Goal 1: Support Underserved Communities
- Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing
- Strategic Goal 3: Promote Homeownership
- Strategic Goal 4: Advance Sustainable Communities
- Strategic Goal 5: Strengthen HUD's Internal Capacity

These goals present the core vision of what HUD hopes to accomplish, the strategies to accomplish those objectives, and the indicators of success. Through these efforts, HUD will give the American people and their communities the opportunity to thrive.

Summary of HUD's Self-Assessment (Essential Element A-F)

This report highlights HUD's accomplishments, during fiscal year (FY) 2021, in establishing and maintaining a model Equal Employment Opportunity (EEO) program based on the six Essential Elements outlined by the U.S. Equal Employment Opportunity Commission (EEOC). Those six Essential Elements are:

- A. Demonstrated Commitment from Agency Leadership
- B. Integration of EEO into the Agency's Strategic Plan
- C. Management and Program Accountability
- D. Proactive Prevention of Unlawful Discrimination
- E. Efficiency
- F. Responsiveness and Legal Compliance

HUD reviewed its program activities against the six Essential Elements and where program deficiencies were identified, planned activities to attain compliance were developed. The sections

below highlight HUD's major activities and challenges regarding each of the Essential Elements. Additional information can be found in Part G of this report, the Department's Self-Assessment Checklist, which consists of a list of Yes/No (Met/Unmet) questions grouped under each Essential Element.

Essential Element A: Demonstrated Commitment from Agency Leadership – *Requires the Agency Head to communicate a commitment to EEO and a discrimination-free workplace.*

Accomplishments

- The Department communicated its commitment to EEO and a workplace free of discrimination by issuing the EEO and Alternative Dispute Resolution (ADR) Policy Statements. The policy statements were disseminated electronically to all employees and published on the HUD website in accessible formats compliant with Section 508 of the Rehabilitation Act.
- HUD informs its employees about the EEO and ADR process during bi-weekly new employee orientation, annual training requirements, and ad hoc requested trainings.
- Representatives from each HUD Employee Resource Group/Affinity Group (ERG) was afforded the opportunity to participate as a member of the organization's barrier analysis team (BAT) to assist in analyzing overall disparities within the Department. In August 2021, ODEEO sponsored Equal Employment Opportunity Commission facilitated training for HUD ERG leaders, Program Office Discrimination Complaint Managers (DCMs), Staffing and Recruitment and Reasonable Accommodations Office staff. The training included MD 715 Reporting and Barrier Analysis Training. The ERG leaders are serving as members of the HUD BAT and attended agency sponsored EEOC MD 715 training along with our OCHCO partners to provide them with the tools they need to contribute to the agency's annual report.
- HUD provided Reasonable Accommodations training to 369 supervisors during FY 2021 and began providing a brief Reasonable Accommodation presentation to new employees during the bi-weekly New Employee Orientation.
- The agency developed criteria to recognize employees, supervisors, managers, and units demonstrating superior accomplishments in equal employment opportunity that will be included in the annual Secretary's Awards Ceremony.

Deficiency

- HUD has not implemented an Anti-Harassment Program and procedures for employees. However, HUD has consulted with EEOC to ensure that the Anti-Harassment Program and procedures follow EEOC's guidelines.

Essential Element B: Integration of EEO into the Agency's Strategic Mission – *Requires the Agency's EEO program to be organized and structured to maintain a workplace that is free from discrimination in its management policies, practices, or procedures and supports the agency's mission, as reflected in the strategic plan.*

Accomplishments

- The Director of the Office of Departmental Equal Employment Opportunity (ODEEO) reports directly to the Deputy Secretary of the agency, along with the other mission-related programmatic office leadership, effectively providing regular advice to the agency head and other senior leaders on the state of EEO and other matters that would support the efficiency and legal compliance of the EEO program.
- The Department's EEO Director regularly met with other senior leaders on the state of EEO to keep them apprised of EEO activity impacting their respective program areas and to highlight best practices among the various offices.
 - Quarterly EEO Briefings: Quarterly meetings to provide program office leadership an overview of EEO activity and review of workforce data as it pertains to equal employment practices and affirmative employment programs to maintain a non-discriminatory workplace.
 - Monthly Partnership Meetings: Monthly meetings to discuss key issues and initiatives that require the perspective of Human Resources (OCHCO), legal (Office of General Counsel), and EEO. The intent is to enhance collaboration and partnering in anticipation of horizontal issues.
- HUD presented and published, on its internal and external websites, the FY 2020 Annual Report on Hispanic Employment for the Department.
- To implement an EEO program, HUD successfully addressed the critical vacancies of the Agency's EEO Director and the Equal Employment Opportunity Division Director. These core positions were essential to have in place to ensure a model EEO program. Other key vacant positions, such as, the Affirmative Employment Division Team Lead,

the Equal Employment Opportunity Division Team Lead, and two Equal Employment Specialists, that would serve to effectively administer various agency special emphasis programs were hired as well.

Deficiency

- HUD was unable to sufficiently administer an Anti-Harassment program in FY 2021. HUD's Anti-Harassment Program is currently linked to on-going collective bargaining agreement (CBA) negotiations, and upon agreement, HUD will train managers and supervisors on their responsibilities.

Essential Element C: Management and Program Accountability – *Requires the Agency Head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.*

Accomplishments

- HUD sponsored Barrier Analysis and MD 715 training, facilitated by the EEOC, to key internal stakeholders and contributors to the MD 715 report.
- HUD's EEO office developed an expansive library of EEO courses and established an EEO Training HUB, to be offered through HUD Learn and at the request of program office leadership and employees.
- Critical to the success of this element is informing senior management officials of the results of the assessment and the actions through the annual "State of the Agency" briefing. This briefing is provided to the agency head and other senior management officials by the EEO Director, regarding the effectiveness of the organization's EEO programs, policies, and practices, and the discussion and/or development of plans or actions needed to be taken to correct any deficiencies.
- The EEO Office served as a resource to HUD managers and supervisors by providing a variety of ad hoc training sessions and consultations with supervisors and employees on the EEO process and alternative dispute resolution program.

Deficiency

- HUD is in the process of reestablishing the Field Quality Management Reviews (virtually), to regularly assess the regional and field offices for possible EEO program deficiencies. Due to COVID-19 restrictions during FY 2020, Field Quality Management Reviews were postponed.

Essential Element D: Proactive Prevention of Unlawful Discrimination – *Requires the Agency to conduct a self-assessment on at least an annual basis. The self-assessment must identify areas where barriers may operate to exclude certain groups, and strategic plans must be developed to eliminate identified barriers.*

Accomplishments

- HUD regularly reviews workforce, EEO complaint, and grievance data to identify triggers. The reviews have led to targeted training and development of action plans to address the issues revealed during the investigation/analysis.
- HUD strongly encouraged participation in the Office of Personnel Management Federal Employee Viewpoint Survey (FEVS). The results of the FEVS, which are based on the employees' perceptions, are used as a tool to identify the need for improvements in policies, procedures, and practices within the agency.
- HUD's Exit Survey solicits feedback on how to improve the recruitment, hiring, inclusion and advancement of individuals with disabilities. The Exit Survey provides the departing employee an opportunity to present their candid perception of the organization and their opinions on how to improve employment practices (hiring, recruitment, retention, etc.).
- HUD developed an EEO Barrier Analysis Assessment to be completed by the various program office stakeholders to reveal a deeper investigation into policies, procedures and practices that can potentially be barriers to equal employment opportunities.

Deficiency

- No deficiencies for this element.

Essential Element E: Efficiency – *Requires that the Agency Head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process.*

Accomplishments

- HUD has established a firewall between the complaint processing functions of the department's EEO program and the defensive functions of its general counsel. The defensive function for the agency is derived from the Office of General Counsel (OGC). OGC and ODEEO are separate entities under separate leadership with distinct and

specific missions and objectives. Currently, there is staff serving in ODEEO with the sufficient professional background to review FADs, settlement agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents. Consultation with OGC occurs on an as needed basis and ensures the attorney reviewing the matter does not serve in a defense function for the Department.

- HUD requires managers and supervisors, as opposed to individuals delegated with settlement authority, to participate in Alternative Dispute Resolution (ADR) to effectively resolve workplace disputes in an expeditious, cost effective, and mutually agreeable manner.

Deficiencies

- The first three quarters of FY 2021, the agency did not have a system in place to accurately collect, monitor, and analyze the following data: Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official. HUD's FY 2021 average EEO investigation timeframe was 234 days (with extensions and/or amendments); 134.5 days (within regulatory timeframe).
- Low Alternative Dispute Resolution (ADR) Settlement Rate is another deficiency that HUD identified. HUD identified two major challenges that may impact the ADR settlement rate: significant delays in the internal concurrence process for settlement agreements and parties potentially not participating in good faith. HUD will consider options for marketing and ADR participation.

Essential Element F: Responsiveness and Legal Compliance – *Requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.*

Accomplishments

- In FY 2021, HUD filled the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO. HUD awarded a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions and continuously reviews EEO investigation processing to improve efficiency and thoroughness. HUD also timely posted the quarterly No FEAR Act data to its public website in FY 2021, resolving this deficiency from FY 2020. HUD has been in legal compliance with EEOC decisions and orders.

Deficiencies

- No deficiencies for this element.

Other Program Deficiencies

Section 508 Compliance: Under Section 508, agencies must give disabled employees and members of the public access to information comparable to the access available to others. HUD does not have a proactive process in place to ensure that its information and technology, including emails, presentations, mandatory trainings, and internal/external webpages, are accessible.

WORKFORCE ANALYSIS

HUD continues to promote targeted recruitment initiatives to assess workforce demographic changes, succession planning, retention and separation rates, and monitor hiring trends. Provided is a summary review and analysis of the Department's FY 2021 workforce profile based on fiscal year workforce data tables generated by the Department of Treasury's Data Insight system.

In FY 2021, HUD's total workforce consisted of 7,997 employees: 7,750 permanent and 247 temporary employees. The number of permanent employees increased by 175 from 7,575, in FY 2020. The permanent workforce consisted of 41.33% male and 58.67% female. The female participation rate (58.67%), while significantly higher than the Civilian Labor Force (CLF) benchmark (48.21%), has decreased by 0.09% from 58.76% in FY 2020.

Gender Breakdown (Permanent employees – FY 2021):

Males	3,203	(41.33%)
Females	4,547	(58.67%)

Participation rates for Hispanic males (3.77%), Hispanic females (4.59%), White males (22.93%), White females (21.88%), American Indian/Alaska Native males (0.40%), Two or More Races males (0.28%), are all below the CLF rates and the EEOC established benchmarks.

The participation rate of Persons with Targeted Disabilities (PWTD) in the permanent workforce increased by 0.10% from 2.75% in FY 2020, to 2.85% in FY 2021, which meets and exceeds the EEOC federal benchmark of 2.0% for PWTD.

Table 1: Comparison of FY 2020 versus FY 2021 Permanent Workforce Participation Rates by Race, National Origin, Sex and Disability (2014-2018 CLF)

Race/ National Origin	Sex	CLF	FY 2020 Total	FY 2020 Participation Rate	FY 2021 Total	FY 2021 Participation Rate	Ratio Change
Hispanic or Latino	Male	6.82%	285	3.76%	292	3.77%	0.01%
Hispanic or Latino	Female	6.16%	352	4.65%	356	4.59%	-0.06%
White	Male	35.65%	1,755	23.17%	1,777	22.93%	-0.24%
White	Female	31.82%	1,651	21.80%	1,696	21.88%	0.08%
Black or African American	Male	5.70%	812	10.72%	845	10.90%	0.18%
Black or African American	Female	6.61%	2,065	27.26%	2,089	26.95%	-0.31%
Asian	Male	2.19%	218	2.88%	231	2.98%	0.10%
Asian	Female	2.18%	288	3.80%	309	3.99%	0.19%
Native Hawaiian/ Pacific Islander	Male	0.08%	6	0.08%	5	0.06%	-0.02%
Native Hawaiian/ Pacific Islander	Female	0.08%	7	0.09%	7	0.09%	0.00%
American Indian/ Alaska Native	Male	0.31%	29	0.38%	31	0.40%	0.02%
American Indian/ Alaska Native	Female	0.31%	52	0.69%	53	0.68%	-0.01%
Two or More Races	Male	1.05%	19	0.25%	22	0.28%	0.03%
Two or More Races	Female	1.05%	36	0.48%	37	0.48%	0.00%
Persons with Disabilities (PWD)		*12.00%	882	11.64%	964	12.44%	0.80%
Persons with Targeted Disabilities (PWTD)		*2.00%	208	2.75%	221	2.85%	0.10%

*EEOC Disability Benchmarks

HUD reviewed the permanent workforce data in the GS-1 to GS-10 and GS-11 to SES grade level clusters for PWD and PWTD. The analysis revealed that the agency exceeded their goal of 12.00% for PWD in the GS-1 to GS-10 grade level cluster (21.98%), an increase of 1.61% from FY 2020 representation rate. The data presented a trigger in the PWD in the GS-11 to SES grade level cluster, whereas the GS-11 to SES grade level cluster representation rate for PWD was 11.84%, which is 0.16% below the 12.00% goal. The analysis for PWTD in the GS-1 to GS-10 (8.13%) and GS-11 to SES (2.52%) grade level clusters revealed that HUD exceeded the 2.00% goal in both grade level categories.

Progress Toward Goals for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD)

	Persons with Disabilities	Persons with Targeted Disabilities
EEOC Goal	12.00%	2.00%
GS-1 to GS-10 Grade Cluster	21.98%	8.13%
GS-11 to SES Grade Cluster	11.84%	2.52%

New Hires *(Permanent workforce)*

During FY 2021, HUD hired 715 permanent employees, a decrease of 88 new hires from 803 in FY 2020. Of the 715 new employees, 119 or 16.64% were PWD and 32 were PWTD or 4.48% of total new hires: both percentages well above the federal government participation goals. While White males represented the majority (24.62%) of the new permanent employees hired, it did not meet the 35.65% CLF participation rate. Native Hawaiian/Pacific Islander males and females represented the lowest participation rate (0.12% each) of the permanent employees hired.

Employee Separations *(Permanent workforce)*

In FY 2021, there were 619 permanent employees who separated from HUD (414 voluntarily and 205 involuntarily). Black or African American females represented the largest group (167) to separate (111 voluntarily and 56 involuntarily), closely followed by White males (163) as the next largest group to separate (121 voluntary and 42 involuntary). In addition, 81 PWD separated, of which 51 were voluntary and 30 involuntary. Lastly, 24 PWTD separated, of which 17 were voluntary and 7 were involuntary.

ACCOMPLISHMENTS

Cross-Agency Collaboration

The Office of the Chief Human Capital Officer (OCHCO), ODEEO, and Office of Diversity, Equity, and Inclusion rewrote HUD's Exit Survey protocol to develop targeted questions to help identify root causes of departure for HUD separating staff who are Veterans and staff that identify as having one or more mental or physical disabilities. The streamlined survey protocol reduced Exit Survey questions from 68 down to 28 questions and this new approach resulted in an 85% increase survey participation rate among separating staff (from 17% to 31.4% participation rate).

Leadership Development

HUD executed a technology-based learning solution to assist department leaders to fulfill the regulatory requirements (5 C.F.R. §412.401, Continuing Executive Development) and comply with HUD policy guidance. The Office of the Chief Human Capital Officer (OCHCO) provided seventy-seven (77) internal training opportunities which were successfully conducted via Adobe Connect, Zoom, WebEx and Microsoft Teams. The Office of Talent Development and Workforce Planning, within OCHCO offered ten (10) no cost training solutions, training 1,174 participants. A cost savings of approximately \$587,000 - \$763,100, based on the average cost of leadership development training being \$500 - \$650 per person per day. HUD employees completed nearly 350 learning opportunities through our partnership with the Treasury Executive Institute (TEI) and over 3,500 through the partnership with Franklin Covey (FC). In addition, OCHCO worked with FC to sponsor our third year of the Franklin Covey Leadership Journey Program for GS 12-14 non-supervisors. As a result, 121 employees completed the Program. The total courses/videos launched using the FC All Access Pass (their virtual platform) was 4,897 and the total courses/videos completed was 3,542. Overall, approximately 2,944 unique non-supervisory and supervisory employees completed leadership and career development learning courseware during the FY. Due to the COVID-19 Pandemic, 100% of all the training (live facilitations, webinars, webcasts) occurred through virtual learning platforms.

Employee Development

In alignment with the FY 2021, Employee Development strategy, HUD continued to implement technology-based learning solutions. As a result, the Office of the Chief Human Capital Officer (OCHCO) delivered one hundred and ninety-eight (198) virtual training events that included-Cross-Cutting Skills, Federal Acquisition Certification-Project/Program Management sessions, Employee Development & Growth Series (Book Series), Retirement Training, Career Development Series and Franklin Covey Training Events. This resulted in over 4,270 non-supervisors and supervisors completing these sessions. We also, partnered/consulted with several HUD Program Offices to provide targeted learning solutions. Additionally, the President's Management Council Interagency Rotation Program (PMC) for GS-13/14/15's was offered virtually with two internal and two external participants. The Rotation Assignment Program

(RAP) provided (60) non-supervisors and supervisors with rotational assignments throughout the enterprise. In this FY21, OCHCO created a new Employee Onboarding SharePoint site for all new General Schedule (GS) employees. The site provides an end-to-end experience that begins from the day the job offer is accepted and extends beyond onboarding. All delivered training was virtual (Adobe Connect, Zoom, WebEx and Microsoft Teams).

Diversity, Equity, Inclusion, and Accessibility

HUD worked across the Department to design specific data reports and visualizations that support HUD's Diversity, Equity, Inclusion, and Accessibility (DEIA) efforts. This effort has developed the capability for HUD Executives and Managers to use quantitative data to better understand their current workforce demographic makeup, including the demographics of separating employees and how to leverage workforce data to drive hiring activity.

Inclusive and Engaging Work Environment

HUD reviewed and analyzed the results of the Federal Employee Viewpoint Survey (FEVS) to update its employee engagement action plans. Each quarter, HUD monitors progress against its action plans and holds an annual Secretary's Award Ceremony to recognize the outstanding contributions of its employees.

HUD created a database of all Minority Serving Institutions and other organizations with which to partner to establish a pipeline for the employment of Hispanics-Latinos.

Affinity Groups and Employee Resource Groups (ERGs).

HUD supports established Affinity Groups and ERGs that offer employees an opportunity to network, address common issues and concerns, and receive support from those who share similar backgrounds, experiences, or interests. Some highlights of the important work done by those groups in FY 2021 include:

- **Federally Employed Women (FEW), Widening Opportunities for Women (W.O.W.) Chapter** (*Affinity Group*), is housed in Washington, DC at HUD Headquarters. However, membership is open to all HUD employees and neighboring federal agencies that do not have a FEW chapter. W.O.W. held a Financial Planning Workshop for membership, February 2021, and hosted HUD's Women's History Month Program in March with guest speaker Secretary Marcia Fudge. The chapter held a Father's Day Session, with Guest speaker, Fred Tombar, former HUD Senior Executive, on Leadership Skills from a Father's Perspective, June 2021.

During the W.O.W. membership meetings, the chapter held Leadership Summits and provided training to members on FEW's four focus areas: Compliance, Diversity, Legislative, and Training. April: Wayne Williams, "The Strength in Differences", May: Sharon Parker, "Women's Empowerment" "June: Fred Tombar, "Leadership Skills from a Father's Perspective." Invited Shabiki Clark, Legislative Chairperson to provide presentation to W.O.W. Chapter members in September 2021. The Chapter awarded a Regional Scholarship Award to one member to attend the DC Metro Regional Training in October 2021 and Ms. Cynthia Lane, Secretary for W.O.W. Chapter was nominated and awarded the DC Region Member of the Year Award.

In celebration of Women's Equality Day, September 2021, W.O.W. invited guest speaker Angela D. Minor, Esq., Howard University. In addition, W.O.W. partnered with Women with Mission Chapter to host a speed mentoring session via Zoom with Guest speaker: David Smith, Pension Benefit Guaranty Corporation Division, "What's your Treasure Map?"

- **HUD Veteran's Affinity Group (VAG) (ERG)** hosted a hybrid Memorial Day celebration Honoring Our Fallen - 30th Anniversary Operation Desert Shield/Desert Storm 1991-2021 entitled, "We Remember and Honor." Secretary Fudge gave opening remarks, and the program was filled with high-ranking representation from all branches of the Armed Forces, active and retired. The Keynote speaker was Lieutenant General Russel L. Honoré, United States Army, Retired.
- **Advocates for HUD Employees with Disabilities (AHED) (ERG)**, a disabilities-focused ERG, reports the following accomplishments for FY 2021:
 - Increased membership by 11%.
 - Mentored several employees who have newly identified as disabled and helped them to obtain the services they needed to maximize success.
 - Created a robust atmosphere of peer support and collaboration within the group.
 - Created and presented several engaging and informative events in October, during National Disability Employment Awareness Month (NDEAM).
 - Increased disability awareness by presenting information regarding AHED to our respective agencies.
- **HUD FedQ (Affinity Group)** convened a Keynote Pride Month 2021 event featuring HUD Leadership engaging in an exciting conversation about LGBTQ+ representation at HUD and the agency's work to improve the lives of LGBTQ+ people and their families in its programs. The event was moderated by Joseph Carlile, Special Assistant to the Secretary, who led a roundtable discussion with Jenn Jones, Chief of Staff, and leaders from HUD program offices: Fair Housing Equal Opportunity, Policy, Development and

Research, Public/Indian Housing, Housing, Office of General Counsel, and Community Planning and Development. The conversation involved how HUD and individual program offices are advancing equity for the LGBTQ+ community and what barriers the community still faces within HUD programs. Panelists also provided insight on what actions HUD is currently taking and what future efforts HUD plans to take to help overcome those barriers.

HUD FedQ hosted Dylan Waguespack from True Colors United, a national nonprofit working to end LGBTQ+ youth homelessness, and Fran Ledger from HUD's Office of Special Needs Assistance Programs, convened a Brown Bag discussion on the importance of collecting gender identity in an inclusive and thoughtful way. This learning opportunity titled, "How We Gather Information to End Homelessness Matters: Gender Identity," was very well attended and focused on why HUD grantees collect gender identity information from participants. The event also included a discussion on the process HUD and its federal partners are using to make the gender identity data standard more inclusive and equitable to build trust, increase safety, and have a better chance at understanding the disparities in homeless housing and services that exist based on gender.

HUD FedQ hosted, as part of the multi-event 2021 pride celebration, an event on LGBTQ+ Youth Allyship Presented by Sam Brinton, The Trevor Project, in which Sam discussed the Trevor Project's youth mental health survey results and ways to create affirming, safe environments and relationships. HUD FedQ board member, Lindsay Huusko, hosted a brownbag on LGBTQ+ Cultural Competency with a presentation by Lucas Johansen, IT Specialist at NOAA, and an executive committee member of the NOAA Pride Employee Resource Group. The presentation focused on the importance of language – especially around how it can sometimes perpetuate inequalities – to create a more respectful and inclusive environment.

HUD FedQ participated in the Pride in Federal Service quarterly meetings, celebrated Transgender Day of Remembrance in November 2020, International Nonbinary People day in July 2021, held several social events online, and in-person happy hour to help build community within HUD.

- **The Latino Network (ERG)** created a series of Leadership Calls with Latino Leadership representatives from the private and public sector. A total of 6 calls were organized and delivered to the HUD employee base. Guest speakers were HUD's White House Liaison Analyse Escobar, HUD ADAS Michelle Perez, Ms. Ana Gonzalez of the PEW Research Center, Ms. Rose Villoch-Santiago from the American Cancer Society and Susanna Calderon from Health and Human Services, Provost Uriel Quesada of Loyola University and Dr. Gerardo Cruz-Ortiz from NASA. Approximately 500 people attended the

informative and inspirational conversations with these leaders. They provided great insight and shared great tips with employees.

Plans to Attain the Essential Elements of a Model EEO Program (PART H)

- ***H1: The agency has not established a comprehensive anti-harassment policy and procedures that complies with EEOC's enforcement guidance. (C.2.a.)*** The final anti-harassment policy and procedure successfully passed departmental clearance and was sanctioned by the EEOC oversight team (the program will be live by 05/01/2022).
- ***H2: Establish an effective EEO complaint processing program that timely completes EEO investigations within 180 days and FADs within 60 days of the request. (E.1.f.)*** Continuously review EEO investigation processing to improve efficiency and thoroughness. Timely filled the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO. Awarded a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions.
- ***H3: Low resolution rate in ADR process. There is a perception that management is unwilling to settle complaints. (Based on EEOC's Technical Feedback Letter dated September 2, 2020 - E.3.a-f)*** Provided ADR training to HUD employees to increase awareness and understanding of ADR process and purpose. Ensured that the individuals with settlement authority are not directly involved in the case. Implemented a five-calendar day settlement agreement concurrence review period. Promoted ADR to employees, supervisors, and senior leadership during quarterly GDAS meetings with ODEEO. Trained EEO counselors and ADR specialists in the process of offering and recording offers of ADR and implementing quarterly ADR review of cases. Updated pre-ADR consultations materials to ensure aggrieved are properly advised of process and expectations during ADR.
- ***H4: The agency does not have a system in place to accurately collect, monitor, and analyze the following data: EEO Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official. (E.4.a.1)*** Established a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system.
- ***H5: HUD does not collect the required applicant flow data necessary to determine what part of the recruitment and selection process requires further evaluation. (C.4.c)*** OCHCO and ODEEO established on-going bi-monthly Data Check-in meetings to review current and anticipated data needs and follow up on the progress of acquiring the applicant flow data necessary for EEOC compliance.

PLANNED ACTIVITIES

HUD has identified strategic activities it will take to address the recruitment, hiring, professional development and advancement, and retention of groups with low participation rates. The goals, objectives, and strategic activities are aligned to HUD's MD-715, Inclusive Diversity Strategic Plan (IDSP), other Federal Equal Employment Reports and Plans, and Federal Workforce Executive Orders (EO). Some of HUD's planned activities are listed below:

- Continue to improve recruitment, outreach, hiring, advancement and retention efforts of PWD and PWTD. *(Part I)*
- Disseminate information regarding the EEOC Approved Anti-Harassment Program to all HUD employees (e.g., new employees at orientation, newly appointed managers and supervisors, and employees attending related trainings) via the HUD@Work website in a Section 508 compliant format. *(Anti-Harassment Program – H1)*
- Continue to promote ADR to employees, supervisors, and senior leadership; and develop strategies to implement the remaining recommendations provided from the FY 2018 ADR review:
 1. Publish ADR procedures to outline roles and responsibilities of offering ADR.
 2. Create training materials to provide responsible officials with information regarding resources and process to resolve informal EEO complaints.
(Alternative Dispute Resolution – H3)
- Train all new EEO specialists and personnel to use the new EEO tracking system and migrate historical EEO data to the new system. *(EEO Complaint Tracking System – H4)*
- Obtain required applicant flow data from the new data system platform necessary to conduct a thorough barrier analysis on HUD Mission Critical Occupations (MCO).
(Applicant Flow Data for MCO – H5)
- Identify specific objectives, strategies, and action steps to complete barrier analysis and develop draft recommendations/action plan to incorporate into the Agency's Hispanic Employment Plan with recruitment and hiring timelines and strategic goal and accomplishments that will reflect the increase of the participation of Hispanic employment. *(Low Participation Rate of Hispanic/Latino – I2)*
- 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 Veteran's recruitment programs. This training is provided virtually to include field managers and to accommodate the workplace during the pandemic. *(Part J)*

EEOC FORM 715-01 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
--	---

**CERTIFICATION OF ESTABLISHMENT OF CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, **Wayne A. Williams, Director** am the
Office of Departmental Equal Employment Opportunity, ES-0260-00

**U.S. Department of Housing and Urban Development (HUD)
Principal EEO Director/Official**

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

 Wayne A. Williams, Director Office of Departmental Equal Employment Opportunity U.S. Department of Housing and Urban Development (HUD)	June 2, 2022
---	---------------------

*Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.*

Date

 Marcia L. Fudge, Secretary U.S. Department of Housing and Urban Development (HUD)	June 3, 2022
---	---------------------

Signature of Agency Head or Agency Head Designee

Date

PART G: Agency Self-Assessment Checklist

ESSENTIAL ELEMENT A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP <i>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</i>				
Compliance Indicator		A.1 - The agency issues an effective, up to date EEO policy statement.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comment column. [see MD-715 II(A)]	Yes		FY 2021 EEO and ADR policy statements were issued by the Agency Head on September 13, 2021, and made available to all employees and applicants via HUD.gov.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.	Yes		

Compliance Indicator	A.2 - The agency has communicated EEO policies and procedures to all employees.			
Measures	Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.	
	Yes	No		
A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy?		No	See Part H1
A.2.a.2	Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]	Yes		
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?			
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]	Yes		
A.2.b.3	Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comment column.	Yes		https://www.hud.gov/sites/dfiles/OCHCO/documents/78551c4SECH.pdf https://www.hud.gov/sites/dfiles/OCHCO/documents/78551c4SECH.pdf
A.2.c	Does the agency inform its employees about the following topics?			

A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often and the means by which such training is delivered.	Yes		HUD informs its employees about the EEO process during bi-weekly new employee orientation/onboarding and when an informal complaint is filed.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes		HUD informs its employees about the ADR process during bi-weekly new employee orientation/onboarding and when an informal complaint is filed.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes		HUD provided Reasonable Accommodation training to approximately 369 supervisors during FY 2021. Also, a Reasonable Accommodation briefing is provided every two-weeks to new employees during New Employee Orientation/Onboarding.
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.		No	See Part H1
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If “yes”, please provide how often.	Yes		The agency annually (January/February) informs employees about behaviors that could result in disciplinary action.
Compliance Indicator		A.3 - The agency assesses and ensures EEO principles are part of its culture.		
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal	Yes		The EEO and Equity Engagement Award is included as a part of the Secretary's Award Program.

	employment opportunity? [see 29 CFR § 1614.102(a)(9)] If “yes”, provide one or two examples in the comments section.			
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		
ESSENTIAL ELEMENT B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION - <i>This element requires that the agency's policies, procedures, or practices and support the agency's strategic mission.</i>				
Compliance Indicator	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		The EEO Director reports directly to the Agency Head through the Secretary’s Designee, the Deputy Secretary, as guided by 5 U.S. Code § 302 - Delegation of authority.
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If	N/A		

	“yes,” please provide the title of the agency head designee in the comments.			
B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		The organizational chart reflects the reporting structure of the Deputy Secretary having the delegation of authority, based on 5 CFC §302, for the EEO office.
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If “yes”, please provide the date of the briefing in the comment column.	Yes		The State of the Agency was presented to the Deputy Secretary on September 28, 2021.
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and	Yes		

	other workforce issues? [see MD-715, II(B)]			
Compliance Indicator	B.2 - The EEO Director controls all aspects of the EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comment column.	Yes		
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	Yes		
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		
B.2.d	Is the EEO Director responsible for overseeing	Yes		

	the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]			
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]			N/A
Compliance Indicator	B.3 - The EEO Director and other EEO professional staff are involved in and consulted on management/personnel actions.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that	Yes		

	might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]			
B.3.b	Does the agency’s current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If “yes”, please identify the EEO principles in the strategic plan in the comment column.	Yes		HUD plans to develop a diverse, skilled, and accountable workforce that supports the Department’s current and future business needs. Managers will be held accountable for providing employee feedback, timely addressing performance and conduct deficiencies, fulfilling their EEO responsibilities as managers and employees of HUD, and ensuring meaningful differentiation in employee ratings based on relative performance. By providing employees with continuous learning and developmental opportunities, clear performance expectations, and opportunities for collaboration, HUD will foster an enhanced culture of accountability and performance to better serve the American public.
Compliance Indicator	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible	Yes		

	program deficiencies? [see MD-715, II(D)]			
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes		
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes		
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comment column.	Yes		
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes		
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable	Yes		

	accommodations procedures)? [see MD-715, II(B)]			
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.	Yes		
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; and (u); 5 CFR § 315.709]	Yes		
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(ii)]	Yes		
B.4.a.11	to ensure timely and complete compliance with	Yes		

	EEOC orders? [see MD-715, II(E)]			
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	Yes		
B.4.e	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	Yes		
Compliance Indicator	B.5 - The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.			
Measures	Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.	
	Yes	No		

B.5.a	Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO complaint process? [see MD-715(II)(B)]	Yes		
B.5.a.2	Reasonable Accommodation Procedures? [see 29 CFR § 1614.203(d)(3)]	Yes		
B.5.a.3	Anti-harassment policy? [see MD-715(II)(B)]		No	See Part H1
B.5.a.4	Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes		
Compliance Indicator	B.6 - The agency involves managers in the implementation of its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.6.a	Are senior managers involved in the implementation of Special	Yes		

	Emphasis Programs? [see MD-715 Instructions, Sec. I]			
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]	Yes		

ESSENTIAL ELEMENT C: MANAGEMENT AND PROGRAM ACCOUNTABILITY - *This element requires the agency head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the agency's EEO program and plan.*

Compliance Indicator		C.1 - The agency conducts regular internal audits of its component and field offices.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule	Yes		Program office EEO Activity reviews are conducted quarterly

	for conducting audits in the comments section.			
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	Yes		Program office EEO Activity reviews are conducted quarterly
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes		
Compliance Indicator	C.2 - The agency has established procedures to prevent all forms of EEO discrimination.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		

C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes		
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]		No	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of	Yes		

	notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept. of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept. of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comment’s column.			
C.2.a.6	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		No	
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]	Yes		
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	Yes		
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation	Yes		

	Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]			
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	Yes		
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]	Yes		
C.2.b.5	Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comment column.		No	HUD’s average time frame for processing requests for reasonable accommodations in FY 21 was approximately 34 days and approximately 52% of cases were processed within 30 business days.
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other	Yes		

	applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]			
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comment column.	Yes		PAS requests follow the same procedures as other reasonable accommodation requests. https://www.hud.gov/sites/dfiles/OCHCO/documents/78551c4SECH.pdf
Compliance Indicator	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes		

C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes		
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes		
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes		
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity? [see MD-715, II(C)]	Yes		
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing	Yes		

	conduct? [see Enforcement Guidance, V.C.2]			
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes		
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes		
Compliance Indicator	C.4 - The agency ensures effective coordination between its EEO program and Human Resources (HR) program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether	Yes		

	<p>personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]</p>			
C.4.b	<p>Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]</p>	Yes		
C.4.c	<p>Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]</p>		No	See Part H5
C.4.d	<p>Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]</p>	Yes		

C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		
Compliance Indicator	C.5 - Following a finding of discrimination, the agency explores whether it should take a disciplinary action.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans	Yes		

	Administration, 5 MSPR 280 (1981)]			
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes		The agency does discipline and/or sanction managers and employees for discriminatory conduct. However, there were no individuals sanctioned during this reporting period.
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post-mortem to discuss lessons learned)? [see MD-715, II(C)]	Yes		
Compliance Indicator		C.6 - The EEO office advises managers/supervisors on EEO matters.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis	Yes		HUD provides quarterly EEO Activity briefings to management/supervisory officials to discuss current EEO complaint activities during the quarter, workforce demographics, potential triggers, and recommendations to resolve identified barriers to equal employment.

	updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.			
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		
ESSENTIAL ELEMENT D: PROACTIVE PREVENTION - <i>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</i>				
Compliance Indicator	D.1 - The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special	Yes		

	interest groups? [see MD-715 Instructions, Sec. I]			
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]	Yes		
Compliance Indicator		D.2 - The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes		
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and	Yes		

	realignments? [see 29 CFR §1614.102(a)(3)]			
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If “yes”, please identify the data sources in the comments column.	Yes		HUD regularly reviews workplace climate assessments, focus groups, affinity groups, program evaluations and workforce data.
Compliance Indicator	D.3 - The agency establishes appropriate action plans to remove identified barriers.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.3.a	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes		
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned	Yes		

	activities? [see MD-715, II(D)]			
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		
Compliance Indicator	D.4 - The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	Yes		HUD.gov
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]	Yes		
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	Yes		
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or	Yes		

	targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]			
ESSENTIAL ELEMENT E: EFFICIENCY - <i>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</i>				
Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor	Yes		According to the data in iComplaints, HUD had 10 Acceptance/Dismissal that were completed over 60 calendar days. The average processing time for an Acceptance/Dismissal was 53.07 calendar days.

	report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.			
E.1.e	Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		No	See Part H2
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		
E.1.h	When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes		
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative	Yes		

	judge's decision, pursuant to 29 CFR §1614.110(a)?			
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comment column.	Yes		HUD meets with the contractor quarterly and if needed, daily to resolve identified deficiencies that occur during the processing of EEO complaints.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		
Compliance Indicator	E.2 - The agency has a neutral EEO process.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see	Yes		HUD has established a firewall between the complaint processing functions of the department's EEO program and the defensive functions of its general counsel. The defensive function for the

	MD-110, Ch. 1(IV)(D)] If “yes”, please explain.			agency is derived from the Office of General Counsel (OGC). OGC and ODEEO are separate entities under separate leadership with distinct and specific missions and objectives. Currently, there is staff serving in ODEEO with the sufficient professional background to review FADs, settlement agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents. Consultation with OGC occurs on an as needed basis and ensures the attorney reviewing the matter does not serve in a defense function for the Department.
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comment column.	Yes		EEOD have access to Westlaw, EEOC Regulations, and EEO professionals that has processed complaints for years. HUD’s EEO Office contacts OGC senior leadership, who requests a field office attorney, not acting in a defensive role, conduct the required legal sufficiency review.
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes		
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		

E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]	Yes		
Compliance Indicator		E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		
E.3.c	Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	Yes		
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		

E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		
Compliance Indicator	E.4 - The agency has effective and accurate data collection systems in place to evaluate its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		The agency did not have a system in place to accurately collect, monitor, and analyze the following data: EEO Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official until September 2021.
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		
E.4.a.4	External and internal applicant flow data concerning the applicants'	Yes		

	race, national origin, sex, and disability status? [see MD-715, II(E)]			
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(3)]	Yes		
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]		No	
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		
Compliance Indicator	E.5 - The agency identifies and disseminates significant trends and best practices in its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.	Yes		Using the MD-715 and other workforce data to monitor the progress of established planned activities to eliminate identified triggers and potential barriers to equal employment opportunity.

E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.	Yes		Worked with EEOC to ensure compliance with the RA and AH programs; Received feedback from EEOC/OMB/OPM regarding DEIA program.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		
ESSENTIAL ELEMENT F: RESPONSIVENESS AND LEGAL COMPLIANCE - <i>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</i>				
Compliance Indicator	F.1 - The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement	Yes		

	agreements? [see MD-715, II(F)]			
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		
Compliance Indicator	F.2 - The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing	Yes		

	office? [see 29 CFR §1614.108(g)]			
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		
Compliance Indicator		F.3 - The agency reports to EEOC its program efforts and accomplishments.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act	Yes		

	data? [see 29 CFR §1614.703(d)]			
--	---------------------------------	--	--	--

PART H: EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF A MODEL EEO PROGRAM

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box

Statement of Model Program Essential Element Deficiency - H1

Type of Program Deficiency	Brief Description of Program Deficiency
<p><u>Element A</u> <i>Demonstrated Commitment from Agency Leadership</i></p> <p><u>Element B</u> <i>Integration of EEO into the Agency's Strategic Mission</i></p>	<p>The agency has not disseminated the Anti-harassment policy and procedures to all employees. (A.2.a.1)</p> <p>The agency has not informed its employees about the Anti-harassment program. (A.2.c.4)</p> <p>All managers and supervisors have not received orientation, training, and advice on their responsibilities under the Anti-harassment policy. (B.5.a.3)</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
9/30/2010	In accordance with EEOC MD-715, Federal agencies must have in place an effective anti-harassment program to address sexual and non-sexual harassment and establish a separate independent investigatory process and procedure.	11/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
07/30/2020	Submit the final Anti-Harassment Program and procedures document to internal HUD stakeholders for final review and concurrence that includes EEOC guidance contained in the July 6, 2017 Technical Assistance letter.	Yes	09/30/2021	09/30/2021
10/01/2020	Disseminate EEOC Approved Anti-Harassment Program to all HUD employees (e.g., new employees at orientation, newly appointed managers and supervisors into the managerial/ supervisory ranks, and employees attending related trainings) via the HUD@Work website. <i>(Part G – A.2.a.1 and A.2.c.4)</i>	Yes	09/30/2022	
09/30/2023	Provide orientation, training, and advice to all managers and supervisors on their responsibilities under the Anti-harassment policy. <i>(Part G – B.5.a.3)</i>	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
-------------	-----------------

2021	The final policy and procedure successfully passed departmental clearance and was sanctioned by the EEOC oversight team (the program will be live by 09/30/2022).
2020	HUD completed an interim Anti-Harassment Program. The final is currently in the departmental clearance process.
2020	Submitted a final policy document to internal HUD stakeholders for final review and concurrence that includes EEOC guidance contained in the Technical Assistance letter.
2019	HUD introduced a new initiative titled Harmony and Respect at HUD: Civility Matters by conducting a mandatory training for all HUD employees, designed to raise awareness of inappropriate workplace behaviors, including harassment, and resources and tools to resolve conflict.
2019	HUD finalized its Anti-Harassment Program and submitted it into HUD's internal clearance process, which includes a review by HUD Unions. In addition, the Secretary's Anti-Harassment Policy Statement was reissued on July 19, 2018, addressing deficiencies identified in the EEOC's July 6, 2017 Technical Assistance letter.
2019	HUD ensures EEO and Diversity and Inclusion related training, which includes sexual harassment, is presented annually to employees. The training teaches participants the types of sexual harassment, elements of prohibited workplace conduct, rights of the Federal employee, and responsibilities of the Federal employer.
2017	In response to the EEOC recommendation for a more effective approach to preventing harassment in the workplace, HUD introduced Civil Treatment training. This training emphasized the process for reporting nonsexual harassment and separate investigatory process and procedures.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency – H2

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	The agency has not completed all investigations within the applicable prescribed time frame. (E.1.f.)

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2017	Establish an effective EEO complaint processing program that timely completes EEO investigations within 180 days and FADs within 60 days of the request. <i>(Part G – E.1.f.)</i>	09/30/2020	04/30/2023	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Standardize SOPs for the internal processing of EEO complaints	Yes		
09/30/2022	Fill two critical EEO Specialist GS-12/13 Career Ladder Positions; one GS-7/9/11 EEO Intake Specialist	Yes		
09/30/2021	Timely fill the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO.	Yes		08/29/2021
09/30/2020	Award a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions. <i>(Part G – E.4.a.1.)</i>	Yes	06/30/2021	09/23/2021
09/30/2020	Continuously review EEO investigation processing to improve efficiency and thoroughness. <i>(Part G – E.1.f.)</i>	Yes	9/30/2021	09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
2021	Continuously review EEO investigation processing to improve efficiency and thoroughness.
2021	Timely filled the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO.
2021	Awarded a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions.
2020	Continuing to work toward improving complaint processing to timely complete investigations and FADs.
2020	HUD hired two key EEO personnel in FY 19 instrumental to ensuring timely and efficient EEO complaint processing. First,

	HUD hired a new Team Lead to assist with the implementation of an effective EEO complaint management system that consistently ensures quality and efficient EEO complaint processing. In addition, HUD hired an EEO Program Analyst to advise on the effectiveness and efficiency of HUD's EEO complaint tracking system, identify deficiencies and recommend solutions.
2019	FAD issuance remained within the statutory timeframe for the second year in a row. HUD's FY 19 average FAD issuance rate was 59 days.
2017	A new EEO Division Director was hired in February 2017 and a new Team Leader was assigned.
2017	Increased staff accountability by inserting new elements on performance plans.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency – H3

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	Low resolution rate in ADR process. <i>(Based on EEOC's Technical Feedback Letter dated September 2, 2020 - E.3.a-f)</i>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
9/30/2017	To obtain more ADR resolution and settlements.	9/30/2020	03/31/2023	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2017	Promote ADR to employees, supervisors, and senior leadership.	Yes	9/30/2021	09/30/2021
	Develop strategies to implement the following recommendations identified in the FY 2018 ADR review:			
09/30/2019	1. Publish ADR procedures to outline roles and responsibilities of offering ADR.	Yes	03/31/2023	
09/30/2019	2. Create training materials to provide responsible officials with information regarding resources and process to resolve informal EEO complaints.	Yes	03/31/2023	
09/30/2019	3. Train EEO counselors and ADR specialists in the process of offering and recording offers of ADR and implementing quarterly ADR review of cases.	Yes	09/30/2021	09/30/2021
09/30/2019	4. Update pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.	Yes	09/30/2021	09/30/2021

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Implemented a five-calendar day settlement agreement concurrence review period.	Yes	09/30/2021	09/30/2021
09/30/2020	Provide ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.	Yes	09/30/2021	09/30/2021
09/30/2021	Meet with union officials to foster a collaborative relationship in favor of the ADR program. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes	09/30/2022	
09/30/2021	Conduct a climate assessment survey to ascertain the reasons why employees are reluctant to participate in ADR. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes	06/30/2022	
09/30/2021	Ensure that the individual with settlement authority is not directly involved in the case. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes		09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
2021	Provided ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.
2021	Ensured that the individuals with settlement authority are not directly involved in the case. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>

2021	Implemented a five-calendar day settlement agreement concurrence review period.
2021	Promoted ADR to employees, supervisors, and senior leadership during quarterly GDAS meetings with ODEEO
2021	Trained EEO counselors and ADR specialists in the process of offering and recording offers of ADR, and implementing quarterly ADR review of cases;
2021	Updated pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.
2020	ADR training was provided to management and employees; however, this objective has been impacted by the COVID-19 pandemic. Continuing to work toward five-calendar day settlement concurrence review period.
2018	HUD established ADR standard operating procedures to enhance the efficiency and effectiveness of the program in FY 2018. This tool is also being used to develop effective training for employees, supervisors, and managers during FY 2019.
2018	HUD conducted a review of the ADR program to analyze data and provide recommendations for program enhancement.
2017	In September 2017, HUD produced two videos on the benefits of the ADR program and promotes ADR during its annual EEO and diversity conference.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency – H4

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	The agency did not have a system in place to accurately collect, monitor, and analyze the following data: EEO Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official until September 2021. <i>(E.4.a.1)</i>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
06/04/2019	Establish a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system.	02/07/2020		04/14/2022

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes
Chief Procurement Officer (CPO)	Ronald Flom	Yes

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2020	Migrate HUD’s historical EEO data to newly acquired EEO tracking system. <i>(Part G – E.4.a.1)</i>	Yes	09/30/2022	
02/07/2020	Train EEO specialists and personnel to use the new EEO tracking system.	Yes	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
2021	Established a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system.
2020	The previous contract was terminated due to performance challenges and acquisition of a new EEO tracking system is pending. Implemented an electronic filing system to improve the efficiency and management of case activity. Review of EEO investigation processing improved resulting in a decrease of untimely investigations.
2019	HUD awarded a new contract for an EEO complaint tracking system. In 2019, HUD lost access to its EEO complaint tracking system due to contractual challenges. Immediately, HUD’s EEO office created and implemented a stopgap measure to track EEO data and ensure the continuation of accurate and timely processing of EEO complaints.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency – H5

Type of Program Deficiency	Brief Description of Program Deficiency
<p><u>Element C</u> <i>Management and Program Accountability</i></p>	<p>HUD does not collect the required applicant flow data necessary to determine what part of the recruitment and selection process requires further evaluation. (C.4.c)</p> <p><i>NOTE: The recommendations for compliance for this deficiency were presented to HUD by EEOC, in their September 2, 2020, summary report/letter of findings based on the previously conducted Technical Assistance Teleconference, which was held on March 18, 2020.</i></p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/02/2020	<p>Establish a plan to collect applicant flow data that identifies:</p> <ol style="list-style-type: none"> 1. The number of applications received for: (a) New hires to mission critical occupations; (b) Internal competitive promotions to mission-critical occupations; (c) Internal competitive promotions to the senior grade levels; and (d) Career development programs. 2. The number of individuals who qualified for: (a) New hires to mission critical occupations; (b) Internal competitive promotions to mission-critical occupations; (c) 	09/30/2022		

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
	Internal competitive promotions to the senior grade levels; and (d) Career development programs.			

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Office of the Chief Human Capital Officer (OCHCO)	Lori Michalski	Yes
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Meet with OCHCO to identify if the current data collection system can be modified/updated to collect the required applicant flow data.	Yes		08/03/2021
09/30/2022	Obtain required applicant flow data from the new data system platform necessary to conduct a thorough barrier analysis on HUD Mission Critical Occupations (MCO).	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2021	Setup Bi-monthly Data Check-in meetings between OCHCO and ODEEO to review current and anticipated data needs and follow up on the progress of acquiring the applicant flow data necessary for EEOC compliance (ONGOING).
2021	HUD transitioned to USASTaffing mid-April 2021. This new platform provides on-demand reporting across all submitted data elements of a Job Opportunity Announcement (JOA) posted on USAJobs – a big improvement from CareerConnector which limited reportable data elements.

Part I: Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier #11 - **CLOSED**

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Table	A6	<p>CLOSED – UNABLE TO ANALYZE MCO DATA</p> <p>Low Participation Rate of Hispanics-Latinos in HUD’s Mission Critical Occupations (MCOs) could not be assessed as HUD workforce data system is unable to accurately identify the number of employees under the Agency-specific MCOs within the general OPM category series such as:</p> <ul style="list-style-type: none"> • GS-0301 – CPD Representative and • GS-1101 – Portfolio Manager / Public Housing Revitalization Specialist / Multi-Family Housing Program Manager / Account Executive / Underwriters / Single Family Housing Specialist <p>HUD’s inability to collect and analyze MCO data is being addressed in Part H5 of this report.</p> <p>The only participation rate pertaining to an Agency specific MCO that could be assessed was the GS-0360 – Equal Opportunity Specialist and based on Workforce Data Table A6 for FY 2021 (13.79%), 2020 (13.41%), and 2019 (13.36%), the representation rate for Hispanics-Latinos in MCO GS-0360 has been above parity (9.96%).</p>

Part I: Agency EEO Plan to Eliminate Identified Barrier

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier #12

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A1	Low Participation Rate of Hispanic-Latino Males (3.77% vs. 6.82% CLF) and Females (4.59% vs. 6.16%) in the permanent workforce when compared to the Civilian Labor Force (CLF).

EEO Group(s) Affected by Trigger

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	No	
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
MSPB, Anti-Harassment Processes	No	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Climate Assessment Survey	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Convene Hispanic Working Group among Barrier Analysis Team/HR Partners to conduct Barrier Analysis	10/01/2021	09/30/2022	Yes		
Develop Action Plan based on barrier analysis results.					

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
05/31/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.		
11/01/2022	Develop draft recommendations/action plan to incorporate into the Agency's Hispanic Employment Plan with recruitment and hiring timelines and strategic goal and accomplishments that will reflect the		

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	increase of the participation of Hispanic employment.		

Report of Accomplishments

Fiscal Year	Accomplishments

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	15	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	7	0	6	Erica M. Jones, Reasonable Accommodation Branch Chief, OCHCO erica.m.jones@hud.gov
Processing Section 508 Compliance requests	1	1	50	Jeffrey Salit, Section 508 Coordinator, OCIO jeffrey.l.salit@hud.gov
Processing of Architectural Barriers Act complaints and insuring compliance	0	0	10	Rex J. Pace ABA Coordinator, OGC, Rex.j.pace@hud.gov

Special Emphasis Program Manager for PWD and PWTD	1	0	0	Willie Tucker EEO Specialist, ODEEO Willie.d.tucker@hud.gov
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	1	0	6	Jeffrey Salit, Section 508 Coordinator, OCIO jeffrey.l.salit@hud.gov

- 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:

Section III: Plan to Recruit and Hire Individuals with Disabilities

A. Plan to Identify Job Applicants with Disabilities

- 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 Positional Organization Listing (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 Veteran’s 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 local 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 2021 for PWD and PWTD among the new hires in the permanent workforce. HUD exceeded the Federal government wide 12% goal for PWD (16.64%) and the 2% goal for PWTD at 4.48%.

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: Data Unavailable
New Hires for MCO (PWTD)	Answer: Data Unavailable

Response: HUD has developed a plan to address this data deficiency in Part H of this report.

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: Data Unavailable
Qualified Applicants for MCO (PWTD)	Answer: Data Unavailable

Response: HUD has developed a plan to address this data deficiency in Part H of this report.

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: Data Unavailable

Promotions for MCO (PWTD)

Answer: Data Unavailable

Response: HUD has developed a plan to address this data deficiency in Part H of this report.

Section IV: 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 informs all employees of opportunities to enroll in relevant training, including management training when eligible; HUD maintains a mentoring program for all employees; and HUD administers Exit Surveys that solicits feedback on how to improve the recruitment, hiring, inclusion and advancement of individuals with disabilities.

B. Career Development Opportunities

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

Response: During FY 2021, HUD offers the Franklin Covey Leadership Journey Program for GS 12-14 non-supervisors; President’s Management Council Interagency Rotation Program (PMC) for GS-13/14/15’s, which was offered

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: During FY 2021, PWD received Time Off Awards at lower rates in every hour category except 21 – 30 hours, however, PWTD received Time Off Awards at lower rates in every hour category. Additionally, PWD and PWTD received Cash Awards at a lower inclusion rate than persons with no disability at every cash award level with the one exception of PWTD receiving Cash Awards at the \$5,000 or more level.

Time off awards:

The inclusion rate for PWD (10.95%) and PWTD (9.61%) fell below the inclusion rate for employees with no disability (14.64%) for time off awards between 1 - 10 hours.

The inclusion rate for PWD (10.04%) and PWTD (10.92%) fell below the inclusion rate for employees with no disability (12.03%) for time off awards between 11 - 20 hours.

The inclusion rate for PWTD (6.99%) fell below the inclusion rate for employees with no disability (8.49%) for time off awards between 21 - 31 hours. PWD was slightly higher at 8.72%.

The inclusion rate for PWD (8.42%) and PWTD (7.86%) fell below the inclusion rate for employees with no disability (11.82%) for time off awards between 31 - 40 hours.

Cash Awards:

The inclusion rate for PWD (17.85%) and PWTD (20.52%) for cash awards \$500 and under, was below the inclusion rate for employees with no disability (20.92%).

The inclusion rate for PWD (10.04%) and PWTD (11.79%) for cash awards \$501 - \$999, was below the inclusion rate for employees with no disability (12.49%).

The inclusion rate for PWD (38.44%) and PWTD (41.48%) for cash awards \$1000 - \$1999, was below the inclusion rate for employees with no disability (49.59%).

The inclusion rate for PWD (31.95%) and PWTD (33.62%) for cash awards \$2000 - \$2999, was below the inclusion rate for employees with no disability (44.90%).

The inclusion rate for PWD (4.81%) and PWTD (6.55%) for cash awards \$3000 - \$3999, was below the inclusion rate for employees with no disability (9.92%).

The inclusion rate for PWD (0.00%) and PWTD (0.00%) for cash awards \$4000 - \$4999, was below the inclusion rate for employees with no disability (0.11%).

The inclusion rate for PWD (0.10%) for cash awards \$5000 or more, was below the inclusion rate for employees with no disability (0.43%). PWTD was slightly higher (0.44%).

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: Yes
- b. Pay Increases (PWTD) Answer: Yes

Response:

The inclusion rate for PWD is 2.13% (21) and PWTD is 1.31% (3) for quality step increases, which is below the inclusion rate for employees with no disability (3.97% or 259 employees).

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: N/A
- b. Other Types of Recognition (PWTD) Answer: N/A

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: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable

- b. Grade GS-15
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable

- c. Grade GS-14
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable

- d. Grade GS-13
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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: Data Unavailable
 - II. Internal Selections (PWTD) Answer: Data Unavailable

- b. Grade GS-15
 - I. Qualified Internal Applicants (PWTD) Answer: Data Unavailable
 - II. Internal Selections (PWTD) Answer: Data Unavailable

- c. Grade GS-14
 - I. Qualified Internal Applicants (PWTD) Answer: Data Unavailable
 - II. Internal Selections (PWTD) Answer: Data Unavailable

d. Grade GS-13

I. Qualified Internal Applicants (PWTD) Answer: Data Unavailable

II. Internal Selections (PWTD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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: Data Unavailable

b. New Hires to GS-15 (PWD) Answer: Data Unavailable

c. New Hires to GS-14 (PWD) Answer: Data Unavailable

d. New Hires to GS-13 (PWD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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: Data Unavailable

b. New Hires to GS-15 (PWTD) Answer: Data Unavailable

c. New Hires to GS-14 (PWTD) Answer: Data Unavailable

d. New Hires to GS-13 (PWTD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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: Data Unavailable

II. Internal Selections (PWD) Answer: Data Unavailable

b. Managers

I. Qualified Internal Applicants (PWD) Answer: Data Unavailable

II. Internal Selections (PWD) Answer: Data Unavailable

c. Supervisors

I. Qualified Internal Applicants (PWD) Answer: Data Unavailable

II. Internal Selections (PWD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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

III. Qualified Internal Applicants (PWTD) Answer: Data Unavailable

IV. Internal Selections (PWTD) Answer: Data Unavailable

b. Managers

III. Qualified Internal Applicants (PWTD) Answer: Data Unavailable

IV. Internal Selections (PWTD) Answer: Data Unavailable

c. Supervisors

III. Qualified Internal Applicants (PWTD) Answer: Data Unavailable

IV. Internal Selections (PWTD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

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 to Executives (PWD) Answer: Data Unavailable

b. New Hires to Managers (PWD) Answer: Data Unavailable

- c. New Hires to Supervisors (PWD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

- 8. 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 to Executives (PWTD) Answer: Data Unavailable
- b. New Hires to Managers (PWTD) Answer: Data Unavailable
- c. New Hires to Supervisors (PWTD) Answer: Data Unavailable

Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

Section V: 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

- 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

- 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

- 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.

- 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: <http://hudatwork.hud.gov/HUD/cio/po/i/508/index>

- 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: http://hud.gov/program_offices/eeo Error! Hyperlink reference not valid.Error!
Hyperlink reference not valid.Error! Hyperlink reference not valid.

- 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 2021 was approximately 94 days. Approximately 38% of cases were processed within 30 business days. In FY 2021, there were several cases that were delayed processing as a result of challenges obtaining ergonomic equipment due to the pandemic for example and other extenuating circumstances. Therefore, an additional calculation was prepared to account for these outliers. Excluding these outliers, HUD's average time frame for processing requests for reasonable accommodations in FY 2021 was approximately 34 days and approximately 52% of cases were processed within 30 business days.

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 newer updated draft Reasonable Accommodation Handbook from the EEOC Upon finalization of negotiations with HUD unions, HUD will implement that Handbook.

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, Procedures for Providing Reasonable Accommodation. 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. The updated draft Reasonable Accommodation Handbook 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.

Section VI: 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 2021 was 43. Of the 43 formal EEO complaints, 11 complaints were filed by PWD alleging harassment (23.58%), which exceeded the government wide average of 22.10%. Nevertheless, this is a 6.42% decrease from the number filed in FY 2020 (32.00%).

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 2021.

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 43 formal EEO complaints filed in FY 2021, 7 alleged a failure to provide a reasonable accommodation (16.27%), which exceeded the government wide average of 14.33%.

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 2021.

Section VII: 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.

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 2021, 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: PWD in Grade Cluster GS-11 to SES is below the federal benchmark of 12.00% at 11.85%.

Statement of Condition That Was a Trigger for a Potential Barrier

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	B4	In FY 2021, PWD in Grade Cluster GS-11 to SES is below the federal benchmark of 12.00% at 11.85%.

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	B4	<ul style="list-style-type: none"> • FY 2021 GS-11 to SES participation rate of 11.85%. • FY 2020 GS-11 to SES participate rate of 11.05%.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Other (Please Describe)	No	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s): N/A

Description of Policy, Procedure, or Practice
N/A

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Convene Barrier Analysis Working Group to conduct Barrier Analysis Process	10/01/2021	09/30/2022	Yes		
Develop Action Plan based on barrier analysis results.			Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.		
11/01/2022	Develop draft recommendations/action plan to incorporate into the Agency's Disability Employment Plan with timelines and strategic goal and accomplishments that will reflect the increase of the participation of PWD in GS-11 to SES Grade Clusters.		

Report of Accomplishments

Fiscal Year	Accomplishments