



# The Federal Agency Annual EEO Program Status Report (MD-715)

**FY2023**



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# FY 2023 MD-715 Parts A Through E

## Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
HUD		451 7 <sup>th</sup> Street, SW	Washington	DC	20410	HU83	11001

## Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	8,408	240	8,648

## Part C.1 - Head of Agency and Head of Agency Designee

Agency Leadership	Name	Title
Head of Agency	Marcia L. Fudge	Secretary
Head of Agency Designee	Adrienne Todman	Deputy Secretary

## Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)

EEO Program Staff	Name	Title, Occupational Series, Pay Plan and Grade, Email Address
Head of Agency Official	Marcia L. Fudge	Secretary, <a href="mailto:Secretary.Fudge@hud.gov">Secretary.Fudge@hud.gov</a>
Head of Agency Designee	Adrienne Todman	Deputy Secretary, <a href="mailto:Officeofthedeputysecretary@hud.gov">Officeofthedeputysecretary@hud.gov</a>
Principal EEO Director/Official	Wayne A. Williams	Director, Office of Departmental Equal Employment Opportunity (ODEEO), ES-0260-00, <a href="mailto:Wayne.A.Williams@hud.gov">Wayne.A.Williams@hud.gov</a>
Affirmative Employment Program Manager	Tonya P. Watson	Director, Affirmative Employment Division (AED), ODEEO, GS-0260-15, <a href="mailto:Tonya.P.Watson@hud.gov">Tonya.P.Watson@hud.gov</a>
Complaint Processing Program Manager	Rodney M. Cox	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15, <a href="mailto:Rodney.M.Cox@hud.gov">Rodney.M.Cox@hud.gov</a>
Diversity & Inclusion Officer	Kimberly Nevels	Chief Diversity Officer, OCHCO, GS-0301-15, <a href="mailto:Kimberly.L.Nevels@hud.gov">Kimberly.L.Nevels@hud.gov</a>
Hispanic Program Manager (SEPM)	Magda Brown	Equal Employment Opportunity Specialist, AED, ODEEO, GS-0260-13, <a href="mailto:Magda.J.Brown@hud.gov">Magda.J.Brown@hud.gov</a>
Women's Program Manager (SEPM)	Catrice McNeely	Equal Employment Opportunity Specialist, AED, ODEEO, GS-0260-13, <a href="mailto:Catrice.E.McNeely@hud.gov">Catrice.E.McNeely@hud.gov</a>
Disability Program Manager (SEPM)	Rushelle A. Wilson	Equal Employment Opportunity Specialist, AED, ODEEO, GS-0260-13, <a href="mailto:Rushelle.A.Wilson@hud.gov">Rushelle.A.Wilson@hud.gov</a>
Special Placement Program Coordinator (Individuals with Disabilities)	Shirley Robinson	Special Employment Programs Manager, OCHO, GS-0201-14, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>

EEO Program Staff	Name	Title, Occupational Series, Pay Plan and Grade, Email Address
Reasonable Accommodation Program Manager	Tammy Lawrence	Branch Chief, Reasonable Accommodations Branch, OCHCO, GS-0201-14, <a href="mailto:Tammy.L.Lawrence@hud.gov">Tammy.L.Lawrence@hud.gov</a>
Anti-Harassment Program Manager	Alejandro Hernandez	Director, GS-0301-15, OCHCO, <a href="mailto:Alejandro.Hernandez@hud.gov">Alejandro.Hernandez@hud.gov</a>
ADR Program Manager	Rodney M. Cox	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15, <a href="mailto:Rodney.M.Cox@hud.gov">Rodney.M.Cox@hud.gov</a>
Principal MD-715 Preparer	Rushelle A. Wilson	Equal Employment Opportunity Specialist, AED, ODEEO, GS-0260-13, <a href="mailto:Rushelle.A.Wilson@hud.gov">Rushelle.A.Wilson@hud.gov</a>
Other EEO Staff	Lutheria N. Peters	Data Scientist, AED, ODEEO, GS-1560-14, <a href="mailto:Lutheria.N.Peters@hud.gov">Lutheria.N.Peters@hud.gov</a>

## Part D.1 – List of Subordinate Components Covered in this Report

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.).

If the agency does not have any subordinate components, please check the box.

Subordinate Component	City	State		Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxx)
None						

## Part D.2 – Mandatory and Optional Documents for this Report

In the table below, the agency must submit these documents with its MD-715 report.

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	Included in the Reasonable Accommodation Procedures.
Alternative Dispute Resolution Procedures	Yes	Final version is pending approval
Federal Equal Opportunity Recruitment Program (FEORP) Report	No	
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	No	
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	No	
Human Capital Strategic Plan	No	
EEO Strategic Plan	Yes	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	No	

# Part E – Executive Summary

## Part E.1 - Executive Summary: Mission

The U.S. Department of Housing and Urban Development (HUD or Department) is a cabinet-level Department. HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination and transform the way HUD does business.

HUD's workforce is its greatest asset. At the end of fiscal year (FY) 2023, HUD employed 8,648 employees in its Headquarters (HQ), regional, and field offices throughout HUD's 10 regions.

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.

To support that mission, HUD has nine mission-critical occupations (MCOs) within the agency. The occupations are critical to ensuring the agency can carry out the mission. The mission critical occupations at HUD are:

1. 0110 Economist
2. 0201 Human Resource Specialist
3. 0301 Community Planning and Development (CPD) Specialist or CPD Representative
4. 0360 Equal Opportunity Specialist
5. 1101 Multi-Family Housing Specialist
6. 1101 Portfolio Manager
7. 1101 Single Family Housing Specialist
8. 1102 Acquisition Management
9. 2210 Information Technology (IT) Specialist

In addition to the mission and vision, HUD's strategic plan addresses the agency's overarching goals and priorities. HUD will continue to pursue two overarching priorities: increasing equity and improving customer experience across all HUD programs. The agency's strategic goals are:

**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.

### Part E.2 - Executive Summary: Essential Element A – F

This report highlights HUD's accomplishments, during FY 2023, 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:

Element A: Demonstrated Commitment from Agency Leadership

Element B: Integration of EEO into the Agency's Strategic Plan

Element C: Management and Program Accountability

Element D: Proactive Prevention of Unlawful Discrimination

Element E: Efficiency

Element F: Responsiveness and Legal Compliance

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

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

In FY 2023, HUD senior leadership made a visible commitment to fostering a positive organizational culture and integrating EEO compliance, diversity, equity, and inclusion into HUD's workplace. This included their Townhall meetings held for the agency as well as their in-person participation in HUD events throughout the fiscal year.

#### Commitment to EEO and discrimination-free workplace:

- The agency's EEO Policy Statement is signed by Secretary Fudge and issued annually.
- The annual EEO Policy Statement, released in FY 2023, reiterated HUD's unequivocal commitment to the principles of EEO and a workplace free of discrimination. The Statement reminded all HUD employees, including managers and staff, that they must take responsibility for reporting and addressing discriminatory conduct and preventing all types of discrimination, including workplace harassment and

retaliation. ODEEO trained supervisors and managers on the procedures associated with providing accommodations to qualified Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD).

- The Anti-Harassment policy is updated on an as needed basis and disseminated to all agency staff bi-annually.
- The EEO office partnered with the Anti-Harassment office to jointly issue the Anti-Harassment policy statement with the EEO and ADR policy statement in the next fiscal years to come.
- In FY 2023, HUD also made efforts to advance Diversity, Equity, Inclusion, and Accessibility (DEIA) by developing a DEIA pilot training and a learning highway made available to all employees.

#### **Communication of EEO and discrimination-free workplace**

- EEO, Anti-Harassment, diversity and inclusion, and reasonable accommodations policy statements are published on HUD at work (intranet) and HUD.gov (internet), and provided to new employees during new employee orientation.

**B: Integration of EEO into the Agency's Strategic Plan** – 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.

Consistent with the Agency's strategic mission, HUD's overarching priority is to increase equity across all HUD programs and improve customer experience. HUD's overarching goal specifically focuses on ensuring HUD centers its focus on people, and their lived experiences, with policy and programs that are equity-focused, anti-discriminatory, and that advance housing justice, so that everyone has an affordable, healthy place to live.

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. In addition, HUD is actively taking steps to ensure the reporting structure complies with the requirements under the Cummings Act.

**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.

- The ODEEO Director delivered the Agency's annual "State of EEO" briefing to the Secretary and senior leadership. Throughout FY 2023, the ODEEO Director also briefed senior leadership on EEO activities and initiatives. These briefings presented information on the Agency's workforce demographics and progress regarding the effectiveness of the organization's EEO programs, policies, and practices. The briefings provided an opportunity for interactive discussions and action plan development to

correct deficiencies and address identified triggers of potential barriers to equal employment opportunity.

- HUD's EEO Training Program continues to offer supervisory and non-supervisory courses through HUD Virtual University. Those courses include Civility in the Workplace, Basics of EEO, Managers' Role in Building a Model EEO Program, and many other supervisory courses in preparation for re-entering the workplace.
- ODEEO continued to establish new and strengthen existing relationships with front-line staff and management officials as it pertains to EEO matters, and implementation of policies and procedures.

**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.

- HUD's Affirmative Employment Division led self-assessment briefings with Regional and program offices to identify triggers, potential barriers, progress with implementing the six essential elements and discuss/develop activities to eliminate potential barriers.
- HUD created a Barrier Analysis workgroup to develop a cohesive approach to barrier analysis. The workgroup will develop guidance on how region and program offices can identify triggers; identify whether the anomalies are due to an agency policy, procedure, or practice; and eliminate barriers to equal employment.

**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.

- The Agency continues to encourage the widespread use of a fair Alternative Dispute Resolution (ADR) program.
- HUD continues to require managers and supervisors to participate in ADR to effectively resolve workplace disputes in an expeditious, cost effective, and mutually agreeable manner. ODEEO increased its marketing efforts to promote the benefits of ADR.
- ODEEO continues to work with contract EEO investigators to review EEO investigation processing to improve efficiency and thoroughness.

**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.

- HUD timely posted the quarterly No FEAR Act data to its public website.

- HUD complies with all regulatory reporting requirements to submit and/or post the annual 462 Report and MD-715 report.
- HUD improved its timeliness rate for investigations by transitioning to the new tracking system to streamline the process.
- ODEEO and OGC continued to share responsibility for responsiveness and legal compliance in EEO. Historically, these two offices have combined their efforts to keep the HUD in full compliance with all federal laws and EEOC regulations, management directives, and guidance.
- The ODEEO Director meets with the Deputy Secretary, and regularly informs her and other top management officials of the effectiveness, efficiency, and legal compliance of the HUD's EEO and diversity and inclusion efforts.

#### **Part E.3 - Executive Summary: Workforce Analyses**

HUD conducted analyzes of workforce data to identify triggers to determine if barriers to the equal employment opportunity of employees and applicants exist. A trigger is a trend, difference or anomaly that suggests the need for further inquiry into a particular policy, practice, procedure, or condition. Often, triggers are found through comparison of workforce data to civilian labor force (CLF) percentages or for specific mission critical occupations, the occupational civilian labor force (OCLF). The civilian labor force is the percentage of people over age 16 working or actively looking for work (according to the Bureau of Labor Statistics).

This section provides analyses of workforce data by ethnicity/race, sex, and disability status.

#### **HUD's Total Workforce Analysis**

In FY 2023, HUD's total workforce consisted of 8,648 employees: 8,408 permanent and 240 temporary employees. The number of permanent employees increased by 417 employees from 7,991, in FY 2022.

The permanent workforce consisted of 3,478 (41.37%) males and 4,930 (58.63%) females. The total permanent female participation rate (58.63%) is significantly higher than the Civilian Labor Force<sup>1</sup>(CLF) benchmark (48.21%).

Participation rates in the permanent workforce for Hispanic males 342 (4.07%) and Hispanic females 436 (5.19%); White males 1,880 (22.36%) and White females 1,849 (21.99%); Native Hawaiian/Pacific Islander males 4 (0.05%) and females 10 (0.12%); and Two or More Races males 34 (0.40%) and Two or More Races females 48 (0.57%), were all below their corresponding CLF rates. However, participating above their corresponding CLF rates were Black males 931 (11.07%) and Black females 2,206 (26.24%); Asian males 248 (2.95%) and Asian females 328 (3.90%); Native Hawaiian/Pacific Islander males 4 (0.05%) and Native Hawaiian/Pacific Islander females 10 (0.12%); American Indian/Alaska Native males 39 (0.46%) and American Indian/Alaska Native females 53 (0.63%).

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<sup>1</sup> Civilian Labor Force is derived from the Census reflecting individuals 16 years or older who are employed or seeking employment.

The participation rate of Persons with Disabilities (PWD) in the permanent workforce increased by 0.43% from 1,058 (13.24%) to 1,149 (13.67%) in FY 2023, which exceeds the EEOC federal benchmark of 12.00% for PWD. The participation rate of Persons with Targeted Disabilities (PWTD) in the permanent workforce increased by 0.02% from 234 (2.93%) in FY 2022, to 248 (2.95%) in FY 2023, which exceeds the EEOC federal benchmark of 2.00% for PWTD.

In FY 2021, the GS-11 to SES grade cluster participation rate for PWD was 11.85% and was identified in Part J as a trigger for a potential barrier to equal employment opportunity. However, in fiscal years 2022 and 2023, the GS-11 to SES grade cluster participation rate increased to 12.74% and 13.30%, respectively, exceeding the 12.00% hiring benchmark for PWD, therefore, no longer revealing this grade cluster's participation rate as a trigger for a potential barrier.

#### [\*\*New Hires \(Permanent workforce\)\*\*](#)

During FY 2023, HUD hired 1,011 permanent employees, an increase of 185 new hires from 826 in FY 2022. Of the 1,011 new employees, 155 (15.33%) were PWD and 32 (3.17%) were PWTD, both percentages are well above the EEOC federal benchmark hiring goals. While Black females represented the majority 253 (25.02%) of the new permanent employees hired, Native Hawaiian/Pacific Islander males and females represented the lowest new rate 0 (0.00%) and 2 (0.20%) respectively of the new permanent employees hired.

#### [\*\*Employee Separations \(Permanent workforce\)\*\*](#)

In FY 2023, there were 658 permanent employees who separated from HUD (373 voluntarily and 285 involuntarily/other). Black or African American females represented the largest group 169 (25.68%) to separate (95 voluntarily and 74 involuntarily/other), followed by White males 150 (22.80%) as the next largest group to separate (94 voluntary and 60 involuntary/other). In addition, 95 (7.96%) PWD separated, of which 50 were voluntary and 45 involuntary/other. Lastly, 23 (8.95) PWTD separated, of which 13 were voluntary and 10 were involuntary.

HUD appreciates the opportunity to present this MD-715 EEO Report to the EEOC to guide our efforts in achieving model EEO employer status in the future. In FY 2023 and beyond, HUD will continue to identify areas that need strengthening and strive to remove even more barriers to equality of opportunity.

#### [\*\*Part E.4 - Executive Summary: Accomplishments\*\*](#)

The accomplishments and developments highlighted in this report stem from collaboration among various offices responsible for aspects of the Agency's EEO Program. ODEEO safeguards employment related EEO at HUD. It champions HUD efforts to foster a fair and equitable workplace—one where employment decisions are based on individual merit, and where everyone has an equal chance to succeed as far as their talents will take them.

#### [\*\*Training:\*\*](#)

Throughout the fiscal year, ODEEO provided peer-to-peer support across agencies working on the MD-715 reporting requirements. Those sessions included:

- Cross Agency Working Session: What are your MD-715 Challenges and Successes
- A Filtering Approach for Applicant Flow Data
- MD-715 Tips and Resources
- Creating a Timeline of an On-Time or Early MD-715 Report Submission
- What is Part J?
- What is MD-715 Part J? - A Real-world Example
- OPM's Presentation on Applicant Flow Data
- What are MD-715 Parts G and H

#### **Disability Employment:**

- Established the Accessibility Review Committee comprised of various employees across the agency to review agency's policies, practices, and procedures to ensure they create an environment of inclusiveness that accounts for the accessibility needs of persons with disabilities.
- Conducted a soft launch of the SF-256: Self-Identification of Disability Resurvey Campaign, during its September Preparedness month event. The goal was to educate employees on the importance of updating their disability status and how it helps the agency plan programs and provide resources and services for employees with serious health conditions and disabilities.
- Developed Accessibility technology guidelines to assist employees with virtual meetings and events and ensure 508 compliances.
- Encouraged Schedule A and Workforce Recruitment Program (WRP) training and provided hiring standard operating procedures.
- Provided vision and leadership for strategic recruitment and expanded its outreach efforts with underserved communities. Additionally, the Agency utilized diverse hiring panels for external hires and internal promotions and details and encouraged Schedule A hiring by promoting the use of the WRP to hire interns and full-time employees.

#### **Reasonable Accommodations:**

- The Reasonable Accommodations Branch (RAB) onboarded two new Reasonable Accommodations case managers in FY 2023. Additionally, a new RAB Chief was onboarded in January 2023.

#### **EEO/ADR:**

- Continued to offer Alternate Dispute Resolution (ADR) as an effective and efficient option to resolve workplace disputes at the lowest level. ADR participation increased in FY 2023 due to robust marketing strategies and training to increase awareness of the ADR process.
- Implemented the Workplace Disputes Program to mediate non-EEO issues.
- Acquired a new EEO complaint processing vendor (ETK) to process complaints and transitioned to ETK to improve case monitoring and generated reports.
- Met with Union representatives about the benefits of ADR and discussed collaborating to resolve employee disputes at the lowest level possible.

#### **Affinity Groups and Employee Resource Groups (A/ERGs):**

A/ERGs are a critical link between employees and senior management to connect diverse backgrounds, beliefs, and experiences. Accomplishments from HUD's A/ERGs are:

- The Robert C. Weaver Chapter of Blacks In Government (BIG) Affinity Group held multiple cultural observances throughout the year: Dr. Martin Luther King, Jr. Day (MLK Day) in January 2023; Black History Month in February 2023; and a Juneteenth Celebration during the month of June 2023. BIG continues to deliver great programs to increase cultural awareness by delivering programs that impact the community.
- The Widening Opportunities for Women (W.O.W.) Chapter of Federally Employed Women (FEW) Affinity Group held two phenomenal events in FY 2023 during Women's History Month (March) and Women's Equality Day (August). The W.O.W. Chapter received accolades at the FEW National Training Program, in Columbus, Ohio, by receiving First Place for the Chapter of the Year Award. The award was accepted by the W.O.W. Chapter's Executive Sponsor, who was in attendance.
- The Asian American Native Hawaiian Pacific Islander (AANHPI) ERG conducted the following events during FY 2023:
  - January 25: Lunar New Year
  - May 2: Advancing Leaders through Opportunity: An Inter-agency AANHPI Heritage Month Panel
  - May 16: Book club discussion on Jhumpa Lahiri's Interpreter of Maladies
  - May: In-person DC Happy Hour
  - July: HUD AANHPI Summer Meet and Greet
  - August: Virtual participation in A/ERG Leaders-Introduction to Affinity Groups/Employee Resource Groups-One HUD Ft. Worth, TX

- HUD FedQ held a virtual SAGE Policy Panel with the National LBGTQIA+ Housing Initiative during Pride Month (June 2023). SAGE is a national advocacy and services organization for LGBTQ+ elders.
- The Latino Network ERG successfully conducted Journey to SES Webinar Series in FY 2023 and continues through FY 2024 to increase participation and awareness regarding the upward mobility of the Hispanic Workforce and of all employees of HUD.
- Hispanic Image and the Latino Network celebrated Hispanic Heritage Month in a hybrid event at Headquarters on September 20, 2023. Hispanic Image and the Latino Network were invited to take part in HUD's first-ever Latino Task Force to tackle disparities in housing, procurement, and hiring practices that impact the Hispanic and Latino communities.
- Advocates for HUD Employees with Disabilities (AHED) ERG increased membership by 35%, in FY 2023, and received a Certificate of Appreciation for their efforts during the 2023 Inaugural Accessibility Workshop. In addition, AHED served on HUD's Barrier Analysis Committee.
- HUD Under 5 (HU5) ERG hosted 18 virtual events, in FY 2023, with a total of 5,400 estimated attendees across HUD. HU5 continues to host bi-weekly events, such as: Ascent to Excellence focused on professional growth and development, and Program 101/201 series underscoring the missions and functions of all departments and divisions across the Agency.
- The Veterans Affinity Group (VAG) ERG conducted the following events during FY 2023:
  - January: Coffee with VAG Leadership
  - February: Leadership Symposium
  - March: Coffee with VAG Leadership
  - May: Memorial Day Ceremony, One HUD briefing Denver
  - June: Juneteenth
  - July: Financial Literacy
  - August: One HUD Briefing Fort Worth
  - September: Veteran Suicide Prevention Panel, Walk in Their Footsteps Boot Drive
- In June 2023, Returned Peace Corps Volunteers ERG held a virtual holiday engagement event with 28 attendees. In FY 2024, they are planning to host virtual coffee chats and a Peace Corps Documentary Screening.

#### Part H and Part I Accomplishments

**Part H1:** The agency head is not the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office. (B.1.a)

Accomplishment(s): Met with the Office of General Counsel to engage in meaningful discussions on the importance of EEO office reporting directly to the agency head.

**Part H2:** The agency does not process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures. (C.2.b.5)

Accomplishment(s): The Reasonable Accommodation Branch (RAB) onboarded two new Reasonable Accommodation case managers in FY 2023. Additionally, a new RAB Chief was onboarded in January 2023.

**Part H3:** The agency has not completed all investigations within the applicable prescribed time frame. (E.1.f)

Accomplishment(s): HUD acquired a new EEO Complaint processing vendor to process complaints and transitioned to ETK complaint processing system. The new system will replace the current iComplaints database and encompasses enhanced features to improve case monitoring and generating reports.

**Part H4:** Low participation rate in ADR process. (Based on EEOC's Technical Feedback Letter dated 09/02/2020 - E.3.a-f)

Accomplishment(s): ADR participation has increased this fiscal year due to robust marketing strategies and training to increase awareness of the ADR process and the benefits of ADR participation. HUD implemented the Workplace Disputes Program to mediate non-EEO issues.

**Part I1:** Low Participation Rate of Hispanic-Latino employees in the permanent workforce.

Accomplishment(s): ODEEO partnered with the Regional and Program Offices to identify triggers and develop employment strategies to increase Hispanic participation in the HUD workforce.

**Part I2:** Asian Male participation in the Mission-Critical Occupations is below the Occupational Civilian Labor Force (OCLF) in the 0301 and 1101 Mission-Critical Occupation series.

Accomplishment(s): This is a new trigger, so, there are no accomplishments to report. The analysis was conducted by EEOC, and the results were presented in the October 27, 2023, Technical Feedback Letter from EEOC.

**Part J1 (Closed):** In FY2021, PWD in Grade Cluster GS-11 to SES was below the federal benchmark of 12.00% at 11.85%.

Accomplishment(s): Since FY 2022, the data has revealed that participation has continued to rise from 12.74% to 13.30% in FY 2023. We also interviewed the Special Employment Program Manager who indicated that the agency partnerships with Gallaudet University, Operation Warfighter for disabled Veterans, and State Vocational Rehabilitation Centers to encourage the increase of participation of PWD and PWT. The agency also had a soft launch of the SF-256 campaign that also contributed to the success of the increase in participation rates.

#### **Part E.5 - Executive Summary: Planned Activities**

HUD will continue reviews in FY 2024 to regularly assess the regional and field office EEO programs, introduce the EEO Learning Path (an on-going training model), and provide recommendation for recruitment strategies to increase low participation of Hispanics and Persons with Disabilities/Targeted Disabilities.

HUD will establish a Management Directive (MD)-715 Workgroup made of a cross section of the Agency to ensure accuracy of Agency-wide accomplishments related to EEO and diversity.

#### **Part H and Part I Planned Activities**

**Part H1:** The agency head is not the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office. (B.1.a)

Planned Activity: HUD will ensure that the reporting structure reflects the EEO Director reporting directly to the agency head by 09/30/2024.

**Part H2:** The agency does not process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures. (C.2.b.5)

Planned Activity: Develop processing deadlines for internal stakeholders involved in the processing of accommodation requests, and to develop training for supervisors have target completion dates of 09/30/2024.

**Part H3:** The agency has not completed all investigations within the applicable prescribed time frame. (E.1.f.)

Planned Activity: Monitor new tracking system and assess processing time compliances is September 30, 2024.

**Part H4:** Low resolution rate in ADR process. (E.3.a-f)

Planned Activity: HUD will continue efforts to market and promote ADR usage for both EEO complaints and workplace disputes outside the realm of EEO.

**Part I1:** Low participation rate of Hispanic-Latino Males (4.07% vs. 6.82% CLF) and Females (5.19% vs. 6.16% CLF) in the permanent workforce when compared to the Civilian Labor Force (CLF).

Planned Activity: Continue to meet monthly with the Barrier Analysis Team to investigate the low participation rate trigger and identify any policy, practice, and/or procedure that may be impacting the low participation rate of the Hispanic workforce at HUD.

**Part I2:** Asian Male participation in the Mission-Critical Occupations is below the Occupational Civilian Labor Force (OCLF) in the 0301 and 1101 Mission-Critical Occupation series.

Planned Activity: Determine whether a Glass Wall barrier for Asian Males exist in Mission-Critical Occupations in 0301 and 1101 series.

**Part J1 (Closed):** In FY2021, PWD in Grade Cluster GS-11 to SES was below the federal benchmark of 12.00% at 11.85%.

Planned Activity: This trigger is closed, so, there is no planned activity to report.

**Part J2:** The percentage of New Hires (2.13%) who are PWD in the MCO 301 series is below the benchmark of qualified applicants at 3.39%. In addition, the percentage of New Hires (0.00%) who are PWT in the MCO 0360 job cluster is below the benchmark of qualified applicants at 2.55%.

Planned Activity: Continue the barrier analysis process to identify where in the employment cycle participation of PWD/PWT is impacted and increase awareness of special hiring authorities for PWD/PWT by conducting informational sessions for hiring managers.

**Part J3:** PWD/PWT separated from the agency at rates above the inclusion rate.

Planned Activity: Review and conduct analysis of exit survey data to determine if there are any barriers within the agency causing PWD/PWT to separate at rates higher than their inclusion rate.

PART F: Certification of Establishment of Continuing Equal Employment Opportunity Programs

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  
Office of Departmental Equal Employment Opportunity, ES-0260-00  
am the

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

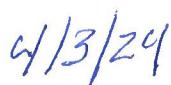
The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and as appropriate, EEO Plans for 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)

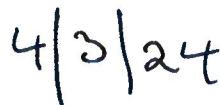


Date

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



Adrienne Todman, Acting Secretary  
U.S. Department of Housing and Urban Development (HUD)



Date

*Signature of Agency Head or Agency Head Designee*

## MD-715 - PART G Agency Self-Assessment Checklist

<p style="text-align: center;"><b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b></p> <p>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</p>				
 <b>Compliance Indicator</b>  <b>Measures</b>	A.1 – The agency issues an effective, up to date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments	
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 comments column. [see MD-715, II(A)]	Yes	The FY 2023 EEO policy statements were issued on February 2, 2023.	
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)]	Yes		
 <b>Compliance Indicator</b>  <b>Measures</b>	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments	
A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes		
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 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 C.F.R § 1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<a href="https://www.hud.gov/program_offices/administration/hudclips/handbooks/admh/7855.1">https://www.hud.gov/program_offices/administration/hudclips/handbooks/admh/7855.1</a>
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.	Yes	The EEO complaint process was explained during 24 New Employee Orientations and 11 trainings for Agency employees held during FY 2023 specifically regarding the EEO complaint process.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	Yes	There were 14 trainings for Agency employees held during FY 2023 regarding the ADR process and the benefits of using ADR.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	Yes	Information about the reasonable accommodation program was provided during the New Employee Orientation, which is held every other week. Information on the reasonable accommodation program is also posted on the Agency's website.
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.	Yes	Employees were informed of the AHP program on the following dates: Oct 20, 2022, EEO Administrative Process and Anti-Harassment Program joint training (with EEO and OGC) posted for on-demand streaming; Dec 7, 2022, NFFE Labor Management Forum Brief; March 8, 2023; EEO Essential Conversations; June 28, 2023, AHP Agency-wide training for Non-Supervisors; June 30, 2023, AHP training video links and policy given HUD-wide dissemination, July 13, 2023, AHP Agency-wide training for Supervisors; and August 24, 2023, ONE HUD AHP Briefing.
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	Employees were informed of the AHP program and inappropriate behaviors on the following dates: Oct 20, 2022, EEO Administrative Process and Anti-Harassment Program joint training (with EEO and OGC) posted for on-demand streaming; Dec 7, 2022, NFFE Labor Management Forum Brief; March 8, 2023, EEO Essential Conversations; June 28, 2023, AHP Agency-wide training for Non-Supervisors; June 30, 2023, AHP Agency-wide

			training for Supervisors; AHP training video links and policy given HUD-wide dissemination, July 13, 2023; and August 24, 2023, ONE HUD AHP Briefing.
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Employees are recognized annually at the Coin of Excellence Ceremony. The Coin of Excellence Ceremony highlights the many contributions and initiatives by individual members of the HUD workforce in advancing EEO and DEIA.
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	
<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b> This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.			
 Compliance Indicator  Measures	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.	Measure Met? (Yes/No/NA)	Comments
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)]	No	See PART H1
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 “yes,” please provide the title of the agency head designee in the comments.	Yes	Deputy Secretary, U.S. Department of Housing and Urban Development
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	
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	Yes	The State of the agency briefing was presented to the Deputy Secretary on June 14, 2023, and to senior management officials on August 30, 2023.

	status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If "yes", please provide the date of the briefing in the comments column.		
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 Compliance Indicator Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments
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)]	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 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.]	Yes	
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) and (c)(3)]	N/A	No subordinate level components.
 Compliance Indicator Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that 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)]	Yes	

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 comments column.	Yes	Overarching Goal: Pursue Transformative Housing and Community-Building Policy and Programs Ensure HUD centers its focus on people, and their lived experiences, with policy and programs that are equity-focused, anti-discriminatory, and that advance housing justice, so that everyone has an affordable, healthy place to live.  Overarching Priority: Increase Equity Increase equity across all HUD programs.
 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
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 program deficiencies? [see MD-715, II(D)]	Yes	
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 comments 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 accommodations procedures)? [see MD-715, II(B)]	Yes	
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; 5 CFR § 213.3102(t) 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)(4)(ii)]	Yes	
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
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 experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments <b>New Indicator</b>
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training 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 C.F.R. § 1614.102(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
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   Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments  <b>New Indicator</b>
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
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	
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b> 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   Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments
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 for conducting audits in the comments section.	Yes	Quarterly EEO Activity briefings are conducted with every program (component) and regional office.
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	Quarterly EEO Activity briefings are conducted with every program (component) and regional office.
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   Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments  <b>New Indicator</b>

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.]	Yes	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	
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)]	Yes	
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 Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
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 accommodation requests 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 in the comments column.	No	We are unable to provide this data due to the limited capabilities of our RA database. We are working towards updating our system. See Part H2 for detailed plan to address deficiency.
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 applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
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 comments column.	Yes	<a href="https://www.hud.gov/program_offices/administration/hudclips/handbooks/admh/7855.1">https://www.hud.gov/program_offices/administration/hudclips/handbooks/admh/7855.1</a>
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
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 conduct. [see Enforcement Guidance, V.C.2]	Yes	
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 Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	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]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
C.4.d	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)]	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  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
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 Administration, 5 MSPR 280 (1981)]	Yes	
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	During FY 2023, one (1) individual was disciplined/sanctioned for discriminatory conduct.
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? [see MD-715, II(C)]	Yes	
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
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 updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	The EEO Office conducted quarterly briefings with the senior leadership of each program and regional office.
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

This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.

 Compliance Indicator   Measures	<p>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</p>	Measure Met? (Yes/No/NA)	Comments
D.1.a	<p>Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]</p>	Yes	
D.1.b	<p>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; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]</p>	Yes	
D.1.c	<p>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)]</p>	Yes	
 Compliance Indicator   Measures	<p>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</p>	Measure Met? (Yes/No/NA)	Comments
D.2.a	<p>Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]</p>	Yes	
D.2.b	<p>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)]</p>	Yes	
D.2.c	<p>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 realignments? [see 29 CFR §1614.102(a)(3)]</p>	Yes	
D.2.d	<p>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, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.</p>	Yes	<p>HUD regularly reviews complaint/ grievance data, exit surveys, employee climate surveys, focus group discussions, and information from affinity groups and special emphasis programs.</p>

 Compliance Indicator   Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments
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 activities? [see MD-715, II(D)]	Yes	
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
 Compliance Indicator   Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.hud.gov/program_offices/eoo/action_plan_s_0">https://www.hud.gov/program_offices/eoo/action_plan_s_0</a>
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 targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	

#### Essential Element E: EFFICIENCY

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.

 Compliance Indicator   Measures	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments

E.1.a		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(l)?	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 report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	The average processing time for issuance of acceptance/dismissal decisions was 53.13 days.
E.1.e	Does the agency ensure 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 H3 for further details on how the agency plans to address this deficiency.
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 does 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 judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
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 comments column.	Yes	HUD meets with the contractors quarterly or when necessary to resolve deficiencies that may 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 Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments

E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If “yes”, explain.	Yes	HUD has established a firewall between the complaint processing functions of the EEO program and the defensive function for the agency. The OGC and ODEEO are separate entities under separate leadership with distinct and specific missions and objectives.
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 comments column.	Yes	The EEO office has access to Westlaw, EEOC Regulations, and EEO professionals that have served as subject matter experts. HUD’s EEO Office contacts OGC senior leadership, who assigns a field office attorney, not acting in a defensive role, to 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 Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments
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   Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
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	
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' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	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]	Yes	
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   Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
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	HUD uses 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	In FY 2023, HUD conducted several working group sessions with external federal agencies to continue to adopt new ideas for conducting barrier analysis, completing the MD-715 report, and utilizing stakeholders and resources to support recruitment of groups with low participation.

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	
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#### Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE

This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

Compliance Indicator Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments
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 agreements? [see MD-715, II(F)]	Yes	
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 Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments
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 office? [see 29 CFR §1614.108(g)]	Yes	
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  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments
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 data? [see 29 CFR §1614.703(d)]	Yes	

# MD-715 – Part H1 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

## Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Essential Element B: Integration of EEO into the Agency's Strategic Mission	The agency head is not the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office. (B.1.a)

## 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)
05/04/2023	Ensure the reporting structure reflects the agency head as the immediate supervisor of the EEO Director.	03/01/2024		

## 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
General Counsel, Office of General Counsel	Damon Smith	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)
09/30/2024	Meet with the Office of General Counsel (OGC) to develop an action plan to ensure compliance with the Elijah Cummings Act.	Yes		05/24/2023
03/01/2024	Update the organizational chart to reflect the EEO office reporting directly to the agency head.	Yes		

## Report of Accomplishments

Fiscal Year	Accomplishments
2023	Met with OGC to engage in meaningful discussions on the importance of EEO office reporting directly to the agency head.

## MD-715 – Part H2 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Essential Element C: Management and Program Accountability	The agency does not process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures. (C.2.b.5)

### 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)
09/30/2022	To process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in the HUD reasonable accommodation procedures (30 days)		09/30/2024	

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Branch Chief, Reasonable Accommodation Branch	Tammy Lawrence	Yes
Chief Human Capital Officer	Lori Michalski	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)
09/30/2023	To reduce the processing times of reasonable accommodation cases, the Reasonable Accommodations Branch (RAB) plans to on-board two (2) new Reasonable Accommodations Case Managers.	Yes		06/01/2023
09/30/2023	Collaborate with other stakeholder offices involved in processing RA cases to establish case processing deadline in those offices.	Yes	09/30/2024	
09/30/2023	Partner with the Office of General Counsel to develop new training for supervisors, which will reiterate expectations for timely processing of cases.	Yes	09/30/2024	

### Report of Accomplishments

Fiscal Year	Accomplishments
2023	The RAB onboarded two new Reasonable Accommodation case managers in FY23. Additionally, a new RAB Chief was onboarded in January 2023.

## MD-715 – Part H3 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Essential Element E: Efficiency	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.	09/30/2020	09/30/2024	

### 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
Director, Equal Employment Opportunity Division	Rodney M. Cox	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)
09/30/2024	Continuously monitor and review investigation with new vendor and tracking system to ensure quality and timeliness with processing investigations.	Yes		
09/30/2024	Transition to the new tracking system to streamline the procedures.	Yes		
09/30/2023	Revise complaint process to decrease processing times. Formal complaints are acknowledged within 5 calendar days of receipt. Acceptance/ Dismissal (A/D) decisions are prepared and provided within 30 calendar days of formal filing. Final Agency Decisions (FADs) are requested and/or initiated not more than 30 days of FAD election/order and not more than 40 days when an election has not been provided by the Complainant.	Yes		09/30/2023
09/30/2023	Meet quarterly with contract investigators to identify and address processing deficiencies. Request investigations 1 to 3 calendar days after acceptance decision issued. Review and return investigative plans, and reports of investigations (ROI) within 3-5 calendar days of receipt.	Yes		09/30/2023

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	02/26/2023	09/30/2023
09/30/2022	Fill two critical EEO Specialist GS 12/13.	Yes	04/01/2023	08/13/2023
09/30/2022	Career Ladder Positions: One GS-7/9/11 EEO Intake Specialist.	Yes	04/01/2023	04/10/2023
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. (Part G – E.4.a.1)	Yes	06/30/2021	09/23/2021
09/30/2020	Continuously review EEO investigation processing to improve efficiency and thoroughness. (Part G – E.1.f)	Yes	09/30/2021	09/30/2021

## Report of Accomplishments

Fiscal Year	Accomplishments
2023	Acquired new EEO Complaint processing vendor to process complaints.
2023	Transitioned to ETK complaint processing system. The new system will replace the current iComplaints database and encompasses enhanced features to improve case monitoring and generating reports.
2022	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.
2022	HUD filled the critical vacancies of the Equal Employment Opportunity Division with and two (2) Equal Employment Specialists.
2022	Procured iComplaints (EEO complaint tracking system) to effectively monitor and manage complaint activity.
2022	Increased marketing and awareness of ADR to increase participation in ADR for early EEO complaint and employee dispute resolution.
2021	Continuously reviewed 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	Continued 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.

## MD-715 – Part H4 Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Essential Element E: Efficiency	Low participation rate in ADR process. (Based on EEOC's Technical Feedback Letter dated 09/02/2020 - E.3.a-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	Developing a plan to consistently increase participation in the ADR process.	09/30/2020	09/30/2024	

### 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
Director, Equal Employment Opportunity Division	Rodney M. Cox	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)
09/30/2021	Meet with union officials to foster a collaborative relationship in favor of the ADR program. (Activity recommended by EEOC)	Yes	09/30/2023	09/30/2023

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	via 09/02/2020 Technical Assistance Letter)			
09/30/2021	Conduct a climate assessment survey to ascertain the reasons why employees are reluctant to participate in ADR. (Activity recommended by EEOC via 09/02/2020 Technical Assistance Letter)	Yes	09/30/2024	
09/30/2021	Ensured the individual with settlement authority is not directly involved in the case. (Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)	Yes		09/30/2021
09/30/2020	Implemented a five-calendar day settlement agreement concurrence review period.	Yes	09/30/2021	09/30/2021
09/30/2020	Provided ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.	Yes	09/30/2021	09/30/2021
09/30/2019	Published ADR procedures to outline roles and responsibilities of offering ADR.	Yes	03/31/2023	09/30/2022
09/30/2019	Created training materials to provide responsible officials with information regarding resources and process to resolve informal EEO complaints.	Yes	03/31/2023	09/30/2022

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Trained EEO counselors and ADR specialists in the process of offering and recording offers of ADR and implementing quarterly ADR review cases.	Yes	09/30/2021	09/30/2021
09/30/2019	Updated pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.	Yes	09/30/2021	09/30/2021
09/30/2017	Promoted ADR to employees, supervisors, and senior leadership.	Yes	09/30/2021	09/30/2021

## Report of Accomplishments

Fiscal Year	Accomplishments
2023	ADR participation has increased this fiscal year due to robust marketing strategies and training to increase awareness of the ADR process and the benefits of ADR participation.
2023	Implemented the Workplace Disputes Program to mediate non-EEO issues.
2023	Met with Union representatives about the benefits of ADR and discussed collaborating to resolve employee disputes at the lowest level possible. ODEEO is scheduled to start facilitation training on ADR with union representatives in FY24.
2022	Provided ADR training to approximately 1,120 employees and managers.
2022	Scripted and created a marketing video to promote ADR.
2022	Increased ADR participation by 150%.
2021	Provided ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.
2021	Ensured the individuals with settlement authority are not directly involved in the case. (Activity recommended by EEOC via the 09/02/2022 Technical Assistance Letter)

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 person are properly advised of the process and expectations during ADR.
2020	ADR training was provided to management and employees; however, this objective has been impacted by 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 FY2018. This tool is also being used to develop effective training for employees, supervisors, and managers during FY2019.
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 promoted ADR during its annual EEO and Diversity conference.

## MD-715 – Part I (Hispanic Employment Program) 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: I1

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Analysis of participation rate by Race/National Origin	Table A1	<p>Low Participation Rate of Hispanic-Latino employees in the permanent workforce.</p> <ul style="list-style-type: none"><li>• FY 2023 – Hispanic Males (4.07% vs. 6.82% CLF) and Hispanic Females (5.19% vs. 6.16% CLF)</li><li>• FY 2022 – Hispanic Males (3.85% vs. 6.82% CLF) and Hispanic Females (4.97% vs. 6.16% CLF)</li><li>• FY 2021 – Hispanic Males (3.77% vs. 6.82% CLF) and Hispanic Females (4.59% vs. 6.16% CLF)</li></ul>

### 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	Yes	Collected the participation rates of Hispanic Males and Hispanic Females in the permanent workforce for FY 2021 through FY 2023.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	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
No barrier identified. Barrier analysis process still in progress.

## Objective(s) and Dates for EEO Plan

Objectives	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)
Investigate the five areas of the employment cycle (i.e., recruitment, hiring, promotions, retention, and training) and identify any policy, practice, and/or procedure that may have impacted the participation rate of Hispanic Males and Hispanic Females in HUD's permanent workforce.	08/21/2021	09/30/2023	Yes	09/30/2025	
Convene Hispanic Working Group among Barrier Analysis Team/HR Partners to conduct Barrier Analysis.	10/01/2021	09/30/2022	Yes		11/04/2022

## Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Capital Officer, Office of Administration	Lori A. 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	Modified Date (mm/dd/yyyy)	Completion Date ( mm/dd/yyyy)
09/30/2025	Continue to meet monthly with the Barrier Analysis Team to investigate the low participation rate trigger and identify any policy, practice, and/or procedure that may be impacting the low participation rate of the Hispanic workforce at HUD.		
03/30/2023	Schedule meetings with OCHCO and ODEEO to establish the agency's Hispanic Recruitment Plan.	09/30/2024	
04/01/2023	Quarterly Trigger Strategy Briefings to address low participation and retention of Hispanics.	09/30/2024	
06/01/2022	Invite the Recruitment and Staffing Division to join EEO and DEIA at Quarterly Senior Leader Program Office and Regional Administrator briefings.		05/01/2022
05/31/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.	11/04/2022	11/04/2022
11/01/2022	Develop draft recommendations/ action plan to incorporate into the Agency's Hispanic Employment Plan with recruitment and hiring timelines and strategic goals and accomplishments that will reflect the increase of the participation of Hispanic employment.		08/30/2023

## Report of Accomplishments

Fiscal Year	Accomplishments
2023	<p>OCHCO has conducted the following Outreach events geared to the Hispanic community to help increase awareness and recruitment efforts:</p> <p>The University of Arizona - Large population of HSI and Military - 4/26  LULAC National Conference 7/31/2023 thru 8/5/2023  Latin American Association 39th Annual Career Expo Atlanta GA 9/8/2023  Texas Wesleyan University Career Fair 9/26</p>
2023	ODEEO partnered with the Regional and Program Offices to identify triggers and develop employment strategies to increase Hispanic participation.
2022	ODEEO hosted 2 <sup>nd</sup> EEOC Barrier Analysis training for HUD Barrier Analysis Team members.
2022	Trigger Strategy Briefing addressed low participation and retention of Hispanics. Program office joined ODEEO, HUD Recruitment and Staffing Division, and subject matter experts for a briefing on hiring authorities, recruitment resources and strategies, and sharing best practices for retaining employees.

## MD-715 – Part I (Asian Employment) 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: I2

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Analysis of Asian Males in mission-critical occupations (Analysis was conducted by EEOC and the results were presented in the October 27, 2023, Technical Feedback Letter).	Table A6	<p>Asian Male participation in the Mission-Critical Occupations is below the Occupational Civilian Labor Force (OCLF) in the 0301 and 1101 Mission-Critical Occupation series.</p> <p>EEOC examined the role of Asian Males within HUD's mission-critical occupations and revealed a theory that a "Glass Wall Barrier" may exist. A Glass Wall Barrier exists when an EEO group is unable to obtain employment in the major occupations of an agency.</p> <p>A thorough analysis of a potential Glass Wall Barrier will be conducted to reveal if there are any barriers to Asian Males obtaining employment in the agency's mission-critical occupations, specifically in the 0301 and 1101 series.</p>

### EEO Group(s) Affected by Trigger

EEO Group
Asian Males

### Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	The A4 table was reviewed to identify how Asian Males are participating across the GS grade clusters.

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		Reviewed the A6 table to determine if triggers exist for Asian Males in the mission critical occupations.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	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/yyy)	Date Completed (mm/dd/yyyy)
Determine whether a Glass Wall Barrier for Asian Males exists in mission-critical occupations in 0301 and 1101 series.	10/27/2023	9/30/2025	Yes		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Capital Officer, Office of Administration	Lori A. 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	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
07/01/2024	Establish Barrier Analysis Workgroup to meet (bi-weekly or monthly...TBD) to investigate the glass wall trigger to identify any policy, practice, and/or procedure that may be impacting Asian Males participation in Mission-Critical Occupations.		
09/30/2024	Review the participation rates by grade level for Asian Males in mission-critical occupations (0301 and 1101 series) and then analyzing the applicant flow data (new hires		

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date ( mm/dd/yyyy)
	and competitive promotions) for the same occupations.		
09/30/2025	Assess whether barriers exist for Asian Males in the recruitment and/or hiring process for mission-critical occupation series 1101 by analyzing their participation in senior grade levels GS-13 through SES for the same series.		
09/30/2025	Assess whether Asian Male encountered barriers in the recruitment and selection processes for new hires to mission-critical occupation series 0301and 1101.		
03/30/2025	Review five years of data (if available) to determine if there is a pattern of Asian Males not being selected for mission-critical occupations in series 0301 and 1101.		
09/30/2025	Search for barriers in the recruitment process for promotions to the 0301 series.		
09/30/2025	Investigate every phase of the merit promotion process for the SES.		
9/30/2025	Interview employees from the human resources office about their screening process.		
9/30/2025	Meet with members of the interview panel about their process of identifying the best-qualified applicants and their interview questions.		
9/30/2025	Compare the qualifications of Asian male applicants to the selectees' qualifications.		
9/30/2025	Review the various voting stages for disapproval of Asian male candidates.		

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date ( mm/dd/yyyy)
09/30/2025	Review the participation of Asian males by grade level in occupations with upward mobility.		
09/30/2025	Meet with selecting officials to examine their experiences in the hiring process and to discuss their perception of Asian male candidates.		

### Report of Accomplishments

Fiscal Year	Accomplishments

## **MD-715 – Part J Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

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

### **Section I: Efforts to Reach Regulatory Goals**

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

1. Using the goal of 12.00% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) below.

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

Response: No trigger identified. For PWD, grade level cluster GS-1 to GS-10 is 20.04% and grade level cluster GS-11 to SES is 13.30%. Both grade level clusters for PWD are above the 12.00% benchmark.

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

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

Response: No trigger identified. For PWT, grade level cluster GS-1 to GS-10 is 5.07% and grade level cluster GS-11 to SES is 2.84%. Both grade level clusters for PWT are above the 2.00% benchmark.

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

Response: In FY 2023, HUD communicated the numerical goals during the quarterly EEO activity briefings with the senior leaders and hiring officials of each Program Office and all 10 of HUD's Regional Offices.

## 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 & Competent Staffing for the 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 PWT	1	0	15	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Processing reasonable accommodation requests from applicants and employees	8	0	0	Tammy Lawrence, Branch Chief, OCHCO, <a href="mailto:Tammy.L.Lawrence@hud.gov">Tammy.L.Lawrence@hud.gov</a>
Section 508 Compliance	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>
Architectural Barriers Act Compliance	0	0	10	Rex J. Pace, ABA Coordinator, OGC, <a href="mailto:Rex.J.Pace@hud.gov">Rex.J.Pace@hud.gov</a>
Special Emphasis Program for PWD and PWT	1	0	0	Rushelle Wilson, Disability Program Manager, ODEEO, <a href="mailto:Rushelle.A.Wilson@hud.gov">Rushelle.A.Wilson@hud.gov</a>
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>

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

Answer: Yes

Response: The Reasonable Accommodation Branch (RAB) has received the following training: Reviewing Medical Documentation; NELI’s ADA Workshop; Civility in the Workplace; Communicating Strategically; EEOC’s EXCEL Training Conference; Myers Briggs Type Indicator: Understanding and Working with Personality Types; and Microaggressions in the Workplace. The RAB staff has also individually taken the following courses: Disability Through an Intersectionality Lens by FEED; Getting Reasonable Accommodation of Disabilities Right for Federal Remote, In-Person, and Hybrid Work; Reasonable Accommodation and Compliance from JAN; Post Pandemic Challenges in Your Agency; and What You Should Know about the Impact of Long Covid.

The Recruitment and Staffing Division (RSD) has taken and will continue to take various training offered 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

### **Section III: Plan to Recruit and Hire Individuals with Disabilities**

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD.

#### **A. Plan to Identify Job Applicants with Disabilities**

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

Response: The RSD will continue to market Schedule A appointment authority to hire PWD and PWTD at all recruitment events attended. In addition, the Pathways Program will be an additional source to hire students with a disability and the various Veteran authorities to hire disabled Veterans. These practices

have proven to be successful with the Department reaching the 12.00% goal for PWD and 2.00% goal for PWTD.

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 PWTD, 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, RSD works with the Office of Student Disabilities of various colleges and universities. These partnerships have been developed to educate students about the Schedule A hiring process with HUD. RSD will continue to market Schedule A hiring to Pathways and various Veteran candidates.

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) or at the request of a Program Office for consideration of anticipated positions.

Selecting officials receive quarterly training on how Schedule A hiring authority can be used and they receive an additional overview when reviewing an applicant for consideration using the Schedule A authority. In addition, a 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: In addition to the quarterly Schedule A hiring authority training that selecting officials receive, HUD also 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. These training opportunities are provided virtually to include field managers.

## **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 PWT, in securing and maintaining employment.

Response: RSD will continue to partner with Gallaudet University, and other University Student Disability Affairs Offices to reach students eligible for Schedule A hiring. RSD work with various Vocational Rehabilitation Counselor to hire disabled Veterans in the Non-Paid Work Experience Program which is a resource to recruit and hire PWD and PWT. In addition, HUD continues to partner with Vocational Rehabilitative Services to promote future hiring opportunities for PWD and PWT.

## **C. Progression Towards Goals (Recruitment and Hiring)**

1. Using the goals of 12% for PWD and 2% for PWT as the benchmarks, do triggers exist for PWD and/or PWT 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 (PWT)	Answer: No

Response: No triggers exist for PWD and PWT among new hires in the permanent workforce. New hires for PWD are 15.33%, which is above the 12.00% benchmark. New hires for PWT are 3.17%, which is above the 2.00% benchmark.

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

New Hires for MCO 0301 (PWD)	Answer: Yes
New Hires for MCO 0301 (PWT)	Answer: Yes

Response: New hires for PWD are 25.58%, which is below the benchmark for qualified applicants at 44.94%. New hires for PWT are 0.00%, which is below the benchmark for qualified applicants at 1.99%.

New Hires for MCO 0360 (PWD)	Answer: Yes
New Hires for MCO 0360 (PWT)	Answer: Yes

Response: New hires for PWD are 38.46%, which is below the benchmark for qualified applicants at 43.54%. New hires for PWT are 0.00%, which is below the benchmark for qualified applicants at 2.45%.

New Hires for MCO 1101 (PWD)	Answer: No
New Hires for MCO 1101 (PWTD)	Answer: No

Response: New hires for PWD are 33.33%, which is above the benchmark for qualified applicants at 28.02%. New hires for PWTD are 2.38%, which is above the benchmark for qualified applicants at 1.30%.

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 0301 (PWD)	Answer: Yes
Qualified Applicants for MCO 0301 (PWTD)	Answer: No

Response: Qualified internal applicants for PWD (55.49%) is below the relevant applicant pool benchmark of 57.00%.

Qualified Applicants for MCO 0360 (PWD)	Answer: Yes
Qualified Applicants for MCO 0360 (PWTD)	Answer: No

Response: The qualified internal applicants for PWD (66.67%) is below the relevant applicant pool benchmark of 65.45%.

Qualified Applicants for MCO 1101 (PWD)	Answer: No
Qualified Applicants for MCO 1101 (PWTD)	Answer: No

Response: No trigger.

*Note: The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.*

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 0301 (PWD)	Answer: Yes
Promotions for MCO 0301 (PWTD)	Answer: Yes

Response: Internal promotions for PWD are 44.62%, which is below the benchmark for qualified applicants at 55.49%. Internal promotions for PWTD are 1.54%, which is below the benchmark for qualified applicants at 5.50%.

Promotions for MCO 0360 (PWD)	Answer: Yes
Promotions for MCO 0360 (PWTD)	Answer: Yes

Response: Internal promotions for PWD are 56.25%, which is below the benchmark for qualified applicants at 66.67%. Internal promotions for PWT are 3.13%, which is below the benchmark for qualified applicants at 7.31%.

Promotions for MCO 1101 (PWD)  
Promotions for MCO 1101 (PWT)

Answer: No  
Answer: Yes

Response: Internal promotions for PWD are 72.41%, which is above the benchmark for qualified applicants at 71.90%. Internal promotions for PWT are 3.45%, which is below the benchmark for qualified applicants at 4.41%.

## **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 employees 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 employees with disabilities.

### **A. Advancement Program Plan**

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

Response: HUD offers career development opportunities to all employees via rotational assignments (up to 120 days), non-competitive details, promotions (e.g. career-ladder positions), competitive details and merit promotions. HUD informs all employees of opportunities to enroll in relevant training, including management training when eligible; HUD maintains a mentoring and coaching program for all employees; and HUD administers Exit Surveys that solicit 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 2023, HUD offered numerous career development programs and individual training opportunities which are available to all employees or to target groups/grades. HUD maintains centralized programs to support employees at all levels (e.g., Mentoring, Coaching, Rotational Assignments) as well as targeted programs that change from year to year.

In FY 2023, we offered the SES Readiness Program open to GS-14/15 employees with at least one year of supervisory experience; President's Management Council Interagency Rotation Program (PMC) for GS-13/14/15 employees; and

the CXO Fellowship Program for GS-9-13. HUD's open-enrollment training programs are consistently full and often reach hundreds of participants. Competitive programs have seating limits or policy-established limits.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWT	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	220	220	25 11.36%	25 11.36%	8 3.64%	8 3.64%
Fellowship Programs	5	5	1 20.00%	1 20.00%	0 0.00%	0 0.00%
Mentoring Programs	106	106	18 16.98%	18 16.98%	3 2.83%	3 2.83%
Coaching Programs	96	96	10 10.42%	10 10.42%	3 3.13%	3 3.13%
Training Programs	0	0	0 0.00%	0 0.00%	0 0.00%	0 0.00%
Detail Programs	38	38	2 5.26%	2 5.26%	2 5.26%	2 5.26%
Other Career Development Programs	122	122	21 17.21%	1 0.82%	7 5.74%	1 0.82%

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) below.

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

Response: The percentage of PWD among the qualified internal applicants for all of the career development programs was below the relevant applicant pool benchmark. The percentage of PWD amongst the internal selectees for other career development programs (0.82%), was below the qualified applicant pool benchmark (17.21%).

4. Do triggers exist for PWT among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) below.

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

Response: The percentage of PWD among the qualified internal applicants for all of the career development programs was below the relevant applicant pool benchmark. The percentage of PWD amongst the internal selectees for other career development programs (0.82%), was below the qualified applicant pool benchmark (5.74%).

**Note:** The relevant applicant pool is the inclusion rate for PWD/PWTD participating in the agency.

### 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) below.

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

Response: When comparing the inclusion rate for PWD and PWTD with people with no disability (PWD) the inclusion rate is less for both PWD and PWTD, which indicates a trigger exists. The triggers identified are listed below.

#### Time Off Awards:

- The inclusion rate for PWD (8.79%) and PWTD (8.06%) fell below the inclusion rate for employees with no disability (12.88%) for time off awards between 1 - 10 hours.
- The inclusion rate for PWD (8.62%) and PWTD (7.66%) fell slightly below the inclusion rate for employees with no disability (9.94%) for time off awards between 11 - 20 hours.
- No trigger exists for time off awards between 21 - 30 hours. The inclusion rate for PWD (7.83%) and PWTD (8.47%) was above the inclusion rate for employees with no disability (7.72%)
- The inclusion rate for PWD (9.05%) and PWTD (7.66%) fell below the inclusion rate for employees with no disability (12.05%) for time off awards between 31 - 40 hours.

#### Cash Awards:



- 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) below.

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

Response: The percentage of PWD amongst the SES selectees (0.00%) was below the qualified applicant pool benchmark (89.47%).

- b. GS-15
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-15 selectees (71.43%) was below the qualified applicant pool benchmark 77.42%.

- c. GS-14
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-14 selectees (68.97%) was below the qualified applicant pool benchmark 73.81%.

- d. GS-13
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-13 selectees (63.33%) was below the qualified applicant pool benchmark 71.84%.

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.

a. SES

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

Response: The percentage of PWT amongst the SES of qualified internal applicants (0.00%) was below the relevant applicant pool benchmark of 6.52%.

b. GS-15

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-15 (4.04%) was below the relevant applicant pool benchmark (5.08%). The percentage of PWT amongst the internal selectees for the GS-15 (0.84%), was below the qualified applicant pool benchmark (4.04%).

c. GS-14

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-14 (4.42%) was below the relevant applicant pool benchmark (4.64%). The percentage of PWT amongst the internal selectees for the GS-14 (2.76%), was below the qualified applicant pool benchmark (4.42%).

d. GS-13

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-13 (4.96%) was below the relevant applicant pool benchmark (5.36%). The percentage of PWT amongst the internal selectees for the GS-13 (4.79%), was below the qualified applicant pool benchmark (4.96%).

**Note:** The relevant applicant pool is the PWD/PWT applicants who voluntarily identified their disability status.

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) below.

a. New Hires to SES (PWD)

Answer: No

Response: The percentage of PWD among new hires for SES (66.67%) was above the qualified applicant pool benchmark (64.71%).

b. New Hires to GS-15 (PWD)

Answer: Yes

Response: The percentage of PWD among new hires for the GS-15 (34.38%) fell below the qualified applicant pool benchmark (52.25%).

c. New Hires to GS-14 (PWD)

Answer: Yes

Response: The percentage of PWD among new hires for the GS-14 (40.57%) fell below the qualified applicant pool benchmark (50.61%).

d. New Hires to GS-13 (PWD)

Answer: No

Response: The percentage of PWD among new hires for the GS-13 (48.68%) was above the qualified applicant pool benchmark (47.26%).

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTI 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) below.

a. New Hires to SES (PWTI)

Answer: No

Response: The percentage of PWTI among new hires for SES (0.00%) was above the qualified applicant pool benchmark (0.00%).

b. New Hires to GS-15 (PWTI)

Answer: Yes

Response: The percentage of PWTI among new hires for the GS-15 (0.00%) fell below the qualified applicant pool benchmark (2.24%).

c. New Hires to GS-14 (PWTI)

Answer: Yes

Response: The percentage of PWTI among new hires for the GS-14 (1.89%) fell below the qualified applicant pool benchmark (2.39%).

d. New Hires to GS-13 (PWTI)

Answer: Yes

Response: The percentage of PWTD among new hires for the GS-13 (2.63%) fell below the qualified applicant pool benchmark (2.26%).

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) below.

a. Executives

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWD) | Answer: N/A |
| II. Internal Selections (PWD)          | Answer: N/A |

Response: Applicant flow data for Executives is not available.

b. Managers

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWD) | Answer: N/A |
| II. Internal Selections (PWD)          | Answer: N/A |

Response: Applicant flow data for Managers is not available.

c. Supervisors

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

Response: The percentage of PWD amongst the internal Supervisor selectees (69.23%) was below the qualified applicant pool benchmark (74.22%).

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.

a. Executives

- |   |             |
|---|-------------|
| I. Qualified Internal Applicants (PWTD) | Answer: N/A |
| II. Internal Selections (PWTD)          | Answer: N/A |

Response: Applicant flow data for Executives is not available.

b. Managers

- |   |             |
|---|-------------|
| III. Qualified Internal Applicants (PWTD) | Answer: N/A |
| IV. Internal Selections (PWTD)            | Answer: N/A |

Response: Applicant flow data for Managers is not available.

- c. Supervisors

III. Qualified Internal Applicants (PWTD) Answer: Yes

#### IV. Internal Selections (PWTD) Answer: Yes

Response: The percentage of PWTD among Supervisor qualified internal applicants (4.99%) was below the relevant applicant pool benchmark (5.44%). The percentage of PWTD amongst the internal selectees for Supervisor (3.53%) was below the qualified applicant pool benchmark (4.99%).

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.



Response Applicant flow data for Executives is not available.



Response: Applicant flow data for Managers is not available.



Response: The percentage of PWD among new hires for Supervisors (44.44%) fell below the qualified applicant pool benchmark (48.49%).

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



Response: Applicant flow data for Executives is not available.

- b. New Hires for Managers (PWTD) Answer: N/A

Response: Applicant flow data for Managers is not available.

Response: The percentage of PWTD among new hires for Supervisors (0.00%) fell below the qualified applicant pool benchmark (2.44%).

## 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 workforce 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)
- b. Involuntary Separations (PWD)

Answer: Yes

Answer: Yes

Response: The inclusion rate for PWD (8.01%) exceeded the rate of persons with no disability (7.92%) for voluntary separations.

The inclusion rate for PWD (0.61%) exceeded the rate of persons with no disability (0.28%) for involuntary separations.

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

- a. Voluntary Separations (PWTD)
- b. Involuntary Separations (PWTD)

Answer: Yes

Answer: Yes

Response: The inclusion rate for PWTD (8.06%) exceeded the rate of persons with no disability (7.92%) for voluntary separations.

The inclusion rate for PWTD (1.21%) exceeded the rate of persons with no disability (0.28%) for involuntary separations.

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

Response: Analysis of the PWD/PWT responses in the exit interview results showed that 29.76% of the motivation for leaving the agency was "Organizational Culture"; 25.60% was due to "Work/Life Balance"; and 16.67% was for "Career Advancement."

## **B. Accessibility of Technology and Facilities**

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

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

Response: Internet address: <https://www.hud.gov/accessibility>

How to file a complaint: Contact the Office of Departmental Equal Employment Opportunity (ODEEO) at [EEO@hud.gov](mailto:EEO@hud.gov).

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

Response: Internet address: <https://www.hud.gov/accessibility>

An ABA complaint can be filed using the methods below:

1. Online ABA Complaint Form: <https://access-board.force.com/>
2. E-mail: [enforce@access-board.gov](mailto:enforce@access-board.gov)
3. Fax: 202-272-0081
4. Mail: U.S. Access Board, 1331 F Street, NW, Suite 1000, Washington, DC 20004
3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

Response: The Office of the Chief Information Officer (OCIO) is in the process of revamping the program office to include updated software, policy, and guidance for the 508 compliance and assistive technology program.

### **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 provided final determinations on 600 reasonable accommodation requests in FY 2023. Out of those final determinations, 32.67% were closed within 30 days, and HUD's average processing days were 100.35 days from start to finish. Please note that these average time frames do not include delays outside of the Agency's control, such as delays in providing medical documentation or waiting for equipment to be delivered. Data regarding these types of delays outside of the Agency's control is currently not readily available on a cumulative basis in HUD's current reasonable accommodation case management system.

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 requests for trends.

Response: During FY 2023, the Reasonable Accommodation Branch hosted listening sessions for HUD program offices to understand manager's concerns and needs as well as answer questions about the reasonable accommodation (RA) process. The current RA processes, and standard operating procedures and templates were developed to assist case managers in processing RA cases. Data/Statistics about accommodations granted were provided to inform component managers. Information about the Pregnancy Workers Fairness Act was posted on HUD's website and displayed on the agency's electronic bulletin boards. Additionally, training was provided on telework and remote work as a reasonable accommodation.

Also, in FY 2023, new RA training for managers was developed and will be rolled out during FY 2024. On a biweekly basis, the RA Branch provides onboarding employees RA training during HUD's New Employee Orientation session. Reasonable accommodation training is provided on a one-on-one basis to managers and employees when processing specific accommodation requests.

#### **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 for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Response: PAS request was processed timely. PAS was provided once during FY 2023. HUD will start the process for PAS procurement in FY 2024 to maintain the services.

### **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

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 2023.

#### **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

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

Answer: Yes

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: The agency took the following corrective measures: posted the notice of discrimination for 60 days on the Program Office's bulletin boards and emailed to all employees, provided 2 hours of EEO training focused on the reasonable accommodation process to all supervisors and managers within the office where the finding of discrimination took place; and paid compensatory damages and attorney's fees to the complainant.

## **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 PWT?

Answer: No

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

Answer: N/A

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 (J1) (FY 2021) – CLOSED

Trigger 1	In FY 2021, PWD in Grade Cluster GS-11 to SES was below the federal benchmark of 12.00% at 11.85%	
Barrier(s)	N/A	
Objective(s)	1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process 2. Develop Action Plan based on barrier analysis results	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Lori Michalski, Chief Human Capital Officer Office of Administration		Yes
Wayne Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	The participation rates for PWD in grade cluster GS-11 to SES were as follows: <ul style="list-style-type: none"> <li>• 13.30% for FY 2023</li> <li>• 12.74% for FY 2022</li> <li>• 11.85% for FY 2021</li> <li>• 11.05% for FY 2020</li> </ul>
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	

Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.	Yes	11/07/2022	09/30/2023
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.	Yes	09/30/2023	12/20/2022
09/30/2023	Interview with Special Employment Program Manager to gain insight into the increased participation rates of hiring PWD and PWTd.	Yes		09/30/2023
Fiscal Year	Accomplishments			
2023	Conducted soft launch of the SF-256 resurvey campaign to encourage employees to update their disability status.			
2023	Established regularly scheduled meetings with barrier analysis working group to identify triggers and potential barriers for PWD and PWTd.			
2023	Met with the Special Employment Program Manager who indicated agency partnerships with Gallaudet University, Operation Warfighter for disable Veterans, and State Vocational Rehabilitation Centers to encourage the increase of participation of PWD and PWTd.			
2022	Convened Barrier Analysis Working Group to begin the Barrier Analysis Process.			
2022	Scheduled and convened barrier analysis meeting to discuss objectives and strategies to investigate the potential barrier.			

## Trigger 2 (J2) (FY 2022)

Trigger 2	<p>In FY 2022, the percentage of PWD New Hires (2.13%) in the MCO 301 CPD Specialist/Representative, is below the benchmark of qualified applicants at 3.49%.</p> <p>In addition, the percentage of PWTD New Hires (0.00%) in the MCO 360 Equal Opportunity Specialist is below the benchmark of qualified applicants at 2.55%.</p>	
Barrier(s)	N/A	
Objective(s)	<ol style="list-style-type: none"> <li>1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process</li> <li>2. Develop Action Plan based on barrier analysis results</li> </ol>	
<b>Responsible Official(s)</b>		Performance Standards Address the Plan? (Yes or No)
Lori Michalski, Chief Human Capital Officer Office of Administration		Yes
Wayne Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)		Yes
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
<b>Sources of Data</b>		<b>Sources Reviewed?</b> (Yes or No)
Workforce Data Tables		Yes FY2023, the percentage of PWD (25.58%) selected externally for MCO 0301 positions was below the percentage of PWD (44.94%) who were externally qualified for MCO 0301 positions. Also, in FY2023 the percentage of PWTD (0.00%) selected externally for MCO 0360 was below the percentage of PWTD (2.45%) who were externally qualified for MCO 0360 positions. FY 2022, the percentage of PWD (2.13%) selected externally for MCO 0301 positions was below the percentage of PWD (3.49%) who were externally qualified for MCO 0301 positions. Also, in FY 2022, the percentage of PWTD (0.00%) selected externally for MCO 0360

		positions was below the percentage of PWT (2.55%) who were externally qualified for MCO 0360 positions.		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2024	Continue barrier analysis process to identify where in the employment cycle participation of PWD/PWT is impacted.	Yes		
09/30/2024	Increase awareness of special hiring authorities for PWD/PWT by conducting informational sessions for hiring managers.	Yes		
09/30/2023	Identify specific objectives, strategies, and action steps to complete barrier analysis.	Yes		09/30/2023
09/30/2023	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.	Yes		12/20/2022
Fiscal Year	Accomplishments			
2023	Conducted soft launch of the SF-256 resurvey campaign to encourage employees to update their disability status.			

2023	The barrier analysis team partnered with OCHCO to obtain and review applicant flow data for 0301 series.
2023	Continued to meet regularly with barrier analysis working group to identify triggers and potential barriers.

### Trigger 3 (J3) (FY 2023)

Trigger 3	PWD/PWTD separated from the agency at rates above the inclusion rate.	
Barrier(s)	N/A	
Objective(s)	<ol style="list-style-type: none"> <li>1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process</li> <li>2. Develop Action Plan based on barrier analysis results</li> </ol>	
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)	
Lori Michalski, Chief Human Capital Officer Office of Administration	Yes	
Wayne A. Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)	Yes	
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)	
No	No	
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p>Examination of the B14 table showed that the inclusion rate for PWD (8.01%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).</p> <p>The inclusion rate for PWD (0.61%) also exceeded the inclusion rate for people with no disability in involuntary separations (0.28%).</p> <p>The B14 also revealed that the inclusion rate for PWTD (8.06%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).</p>

		The inclusion rate for PWT (1.21%) also exceeded the inclusion rate for people with no disability in involuntary separations (0.28%).		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	Yes	<p>Analysis of the PWD/PWT responses in the exit interviews showed that:</p> <ul style="list-style-type: none"> <li>• 29.76% of the motivation for leaving the agency was “Organizational Culture”</li> <li>• 25.60% was due to “Work/Life Balance” and</li> <li>• 16.67% was for “Career Advancement”</li> </ul>		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2025	Review and conduct analysis of exit survey data to determine if there are any barriers within the agency causing PWD/PWT to separate at rates higher than their inclusion rate.	Yes		
Fiscal Year	Accomplishments			

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

Response: In FY 2023, all planned activities were completed in a timely manner.

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

Response: Participation rates for PWD has increased over the last three fiscal years; from 12.44% in FY2021 to 13.67% in FY 2023, exceeding the government-wide goal of 12.00%.

Participation rates for PWTd slightly increased over the last three fiscal year; from 2.85% in FY 2021 to 2.95% in FY 2023, exceeding the government-wide goal of 2.00%.

The number of non-competitive Schedule A hires for qualified PWTd increased from 56.82% in FY2022 to 66.67% in FY2023 due to training Managers, HR representatives, and recruiters on schedule A, disability, and other special hiring authorities.

3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Response: The planned activities corrected the identified triggers. HUD will continue to partner with our internal and external stakeholders to execute the remaining planned activities, identify triggers and eliminate any potential barriers identified in the workforce for PWD and PWTd.

## MD-715 – Part J Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

### Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12.00% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) below.

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

Response: No trigger identified. For PWD, grade level cluster GS-1 to GS-10 is 20.04% and grade level cluster GS-11 to SES is 13.30%. Both grade level clusters for PWD are above the 12.00% benchmark.

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

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

Response: No trigger identified. For PWTD, grade level cluster GS-1 to GS-10 is 5.07% and grade level cluster GS-11 to SES is 2.84%. Both grade level clusters for PWTD are above the 2.00% benchmark.

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

Response: In FY 2023, HUD communicated the numerical goals during the quarterly EEO activity briefings with the senior leaders and hiring officials of each Program Office and all 10 of HUD's Regional Offices.

## 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 & Competent Staffing for the 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 PWT	1	0	15	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Processing reasonable accommodation requests from applicants and employees	8	0	0	Tammy Lawrence, Branch Chief, OCHCO, <a href="mailto:Tammy.L.Lawrence@hud.gov">Tammy.L.Lawrence@hud.gov</a>
Section 508 Compliance	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>
Architectural Barriers Act Compliance	0	0	10	Rex J. Pace, ABA Coordinator, OGC, <a href="mailto:Rex.J.Pace@hud.gov">Rex.J.Pace@hud.gov</a>
Special Emphasis Program for PWD and PWT	1	0	0	Rushelle Wilson, Disability Program Manager, ODEEO, <a href="mailto:Rushelle.A.Wilson@hud.gov">Rushelle.A.Wilson@hud.gov</a>
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>

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

Answer: Yes

Response: The Reasonable Accommodation Branch (RAB) has received the following training: Reviewing Medical Documentation; NELI’s ADA Workshop; Civility in the Workplace; Communicating Strategically; EEOC’s EXCEL Training Conference; Myers Briggs Type Indicator: Understanding and Working with Personality Types; and Microaggressions in the Workplace. The RAB staff has also individually taken the following courses: Disability Through an Intersectionality Lens by FEED; Getting Reasonable Accommodation of Disabilities Right for Federal Remote, In-Person, and Hybrid Work; Reasonable Accommodation and Compliance from JAN; Post Pandemic Challenges in Your Agency; and What You Should Know about the Impact of Long Covid.

The Recruitment and Staffing Division (RSD) has taken and will continue to take various training offered 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

### **Section III: Plan to Recruit and Hire Individuals with Disabilities**

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD.

#### **A. Plan to Identify Job Applicants with Disabilities**

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

Response: The RSD will continue to market Schedule A appointment authority to hire PWD and PWTD at all recruitment events attended. In addition, the Pathways Program will be an additional source to hire students with a disability and the various Veteran authorities to hire disabled Veterans. These practices

have proven to be successful with the Department reaching the 12.00% goal for PWD and 2.00% goal for PWTD.

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 PWTD, 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, RSD works with the Office of Student Disabilities of various colleges and universities. These partnerships have been developed to educate students about the Schedule A hiring process with HUD. RSD will continue to market Schedule A hiring to Pathways and various Veteran candidates.

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) or at the request of a Program Office for consideration of anticipated positions.

Selecting officials receive quarterly training on how Schedule A hiring authority can be used and they receive an additional overview when reviewing an applicant for consideration using the Schedule A authority. In addition, a 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: In addition to the quarterly Schedule A hiring authority training that selecting officials receive, HUD also 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. These training opportunities are provided virtually to include field managers.

## **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 PWT, in securing and maintaining employment.

Response: RSD will continue to partner with Gallaudet University, and other University Student Disability Affairs Offices to reach students eligible for Schedule A hiring. RSD work with various Vocational Rehabilitation Counselor to hire disabled Veterans in the Non-Paid Work Experience Program which is a resource to recruit and hire PWD and PWT. In addition, HUD continues to partner with Vocational Rehabilitative Services to promote future hiring opportunities for PWD and PWT.

## **C. Progression Towards Goals (Recruitment and Hiring)**

1. Using the goals of 12% for PWD and 2% for PWT as the benchmarks, do triggers exist for PWD and/or PWT 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 (PWT)	Answer: No

Response: No triggers exist for PWD and PWT among new hires in the permanent workforce. New hires for PWD are 15.33%, which is above the 12.00% benchmark. New hires for PWT are 3.17%, which is above the 2.00% benchmark.

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

New Hires for MCO 0301 (PWD)	Answer: Yes
New Hires for MCO 0301 (PWT)	Answer: Yes

Response: New hires for PWD are 25.58%, which is below the benchmark for qualified applicants at 44.94%. New hires for PWT are 0.00%, which is below the benchmark for qualified applicants at 1.99%.

New Hires for MCO 0360 (PWD)	Answer: Yes
New Hires for MCO 0360 (PWT)	Answer: Yes

Response: New hires for PWD are 38.46%, which is below the benchmark for qualified applicants at 43.54%. New hires for PWT are 0.00%, which is below the benchmark for qualified applicants at 2.45%.

New Hires for MCO 1101 (PWD)	Answer: No
New Hires for MCO 1101 (PWTD)	Answer: No

Response: New hires for PWD are 33.33%, which is above the benchmark for qualified applicants at 28.02%. New hires for PWTD are 2.38%, which is above the benchmark for qualified applicants at 1.30%.

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 0301 (PWD)	Answer: Yes
Qualified Applicants for MCO 0301 (PWTD)	Answer: No

Response: Qualified internal applicants for PWD (55.49%) is below the relevant applicant pool benchmark of 57.00%.

Qualified Applicants for MCO 0360 (PWD)	Answer: Yes
Qualified Applicants for MCO 0360 (PWTD)	Answer: No

Response: The qualified internal applicants for PWD (66.67%) is below the relevant applicant pool benchmark of 65.45%.

Qualified Applicants for MCO 1101 (PWD)	Answer: No
Qualified Applicants for MCO 1101 (PWTD)	Answer: No

Response: No trigger.

*Note: The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.*

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 0301 (PWD)	Answer: Yes
Promotions for MCO 0301 (PWTD)	Answer: Yes

Response: Internal promotions for PWD are 44.62%, which is below the benchmark for qualified applicants at 55.49%. Internal promotions for PWTD are 1.54%, which is below the benchmark for qualified applicants at 5.50%.

Promotions for MCO 0360 (PWD)	Answer: Yes
Promotions for MCO 0360 (PWTD)	Answer: Yes

Response: Internal promotions for PWD are 56.25%, which is below the benchmark for qualified applicants at 66.67%. Internal promotions for PWT are 3.13%, which is below the benchmark for qualified applicants at 7.31%.

Promotions for MCO 1101 (PWD)  
Promotions for MCO 1101 (PWT)

Answer: No  
Answer: Yes

Response: Internal promotions for PWD are 72.41%, which is above the benchmark for qualified applicants at 71.90%. Internal promotions for PWT are 3.45%, which is below the benchmark for qualified applicants at 4.41%.

## **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 employees 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 employees with disabilities.

### **A. Advancement Program Plan**

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

Response: HUD offers career development opportunities to all employees via rotational assignments (up to 120 days), non-competitive details, promotions (e.g. career-ladder positions), competitive details and merit promotions. HUD informs all employees of opportunities to enroll in relevant training, including management training when eligible; HUD maintains a mentoring and coaching program for all employees; and HUD administers Exit Surveys that solicit 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 2023, HUD offered numerous career development programs and individual training opportunities which are available to all employees or to target groups/grades. HUD maintains centralized programs to support employees at all levels (e.g., Mentoring, Coaching, Rotational Assignments) as well as targeted programs that change from year to year.

In FY 2023, we offered the SES Readiness Program open to GS-14/15 employees with at least one year of supervisory experience; President's Management Council Interagency Rotation Program (PMC) for GS-13/14/15 employees; and

the CXO Fellowship Program for GS-9-13. HUD's open-enrollment training programs are consistently full and often reach hundreds of participants. Competitive programs have seating limits or policy-established limits.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWT	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	220	220	25 11.36%	25 11.36%	8 3.64%	8 3.64%
Fellowship Programs	5	5	1 20.00%	1 20.00%	0 0.00%	0 0.00%
Mentoring Programs	106	106	18 16.98%	18 16.98%	3 2.83%	3 2.83%
Coaching Programs	96	96	10 10.42%	10 10.42%	3 3.13%	3 3.13%
Training Programs	0	0	0 0.00%	0 0.00%	0 0.00%	0 0.00%
Detail Programs	38	38	2 5.26%	2 5.26%	2 5.26%	2 5.26%
Other Career Development Programs	122	122	21 17.21%	1 0.82%	7 5.74%	1 0.82%

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

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

Response: The percentage of PWD among the qualified internal applicants for all of the career development programs was below the relevant applicant pool benchmark. The percentage of PWD amongst the internal selectees for other career development programs (0.82%), was below the qualified applicant pool benchmark (17.21%).

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

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

Response: The percentage of PWD among the qualified internal applicants for all of the career development programs was below the relevant applicant pool benchmark. The percentage of PWD amongst the internal selectees for other career development programs (0.82%), was below the qualified applicant pool benchmark (5.74%).

**Note:** The relevant applicant pool is the inclusion rate for PWD/PWD participating in the agency.

### **C. Awards**

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

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

Response: When comparing the inclusion rate for PWD and PWD with people with no disability (PWD) the inclusion rate is less for both PWD and PWD, which indicates a trigger exists. The triggers identified are listed below.

#### Time Off Awards:

- The inclusion rate for PWD (8.79%) and PWD (8.06%) fell below the inclusion rate for employees with no disability (12.88%) for time off awards between 1 - 10 hours.
- The inclusion rate for PWD (8.62%) and PWD (7.66%) fell slightly below the inclusion rate for employees with no disability (9.94%) for time off awards between 11 - 20 hours.
- No trigger exists for time off awards between 21 - 30 hours. The inclusion rate for PWD (7.83%) and PWD (8.47%) was above the inclusion rate for employees with no disability (7.72%)
- The inclusion rate for PWD (9.05%) and PWD (7.66%) fell below the inclusion rate for employees with no disability (12.05%) for time off awards between 31 - 40 hours.

#### Cash Awards:



- 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) below.

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

Response: The percentage of PWD amongst the SES selectees (0.00%) was below the qualified applicant pool benchmark (89.47%).

- b. GS-15
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-15 selectees (71.43%) was below the qualified applicant pool benchmark 77.42%.

- c. GS-14
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-14 selectees (68.97%) was below the qualified applicant pool benchmark 73.81%.

- d. GS-13
  - I. Qualified Internal Applicants (PWD) Answer: No
  - II. Internal Selections (PWD) Answer: Yes

Response: The percentage of PWD amongst the GS-13 selectees (63.33%) was below the qualified applicant pool benchmark 71.84%.

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.

a. SES

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

Response: The percentage of PWT amongst the SES of qualified internal applicants (0.00%) was below the relevant applicant pool benchmark of 6.52%.

b. GS-15

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-15 (4.04%) was below the relevant applicant pool benchmark (5.08%). The percentage of PWT amongst the internal selectees for the GS-15 (0.84%), was below the qualified applicant pool benchmark (4.04%).

c. GS-14

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-14 (4.42%) was below the relevant applicant pool benchmark (4.64%). The percentage of PWT amongst the internal selectees for the GS-14 (2.76%), was below the qualified applicant pool benchmark (4.42%).

d. GS-13

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWT) | Answer: Yes |
| II. Internal Selections (PWT)          | Answer: Yes |

Response: The percentage of PWT among the qualified internal applicants for the GS-13 (4.96%) was below the relevant applicant pool benchmark (5.36%). The percentage of PWT amongst the internal selectees for the GS-13 (4.79%), was below the qualified applicant pool benchmark (4.96%).

**Note:** The relevant applicant pool is the PWD/PWT applicants who voluntarily identified their disability status.

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) below.

a. New Hires to SES (PWD)

Answer: No

Response: The percentage of PWD among new hires for SES (66.67%) was above the qualified applicant pool benchmark (64.71%).

b. New Hires to GS-15 (PWD)

Answer: Yes

Response: The percentage of PWD among new hires for the GS-15 (34.38%) fell below the qualified applicant pool benchmark (52.25%).

c. New Hires to GS-14 (PWD)

Answer: Yes

Response: The percentage of PWD among new hires for the GS-14 (40.57%) fell below the qualified applicant pool benchmark (50.61%).

d. New Hires to GS-13 (PWD)

Answer: No

Response: The percentage of PWD among new hires for the GS-13 (48.68%) was above the qualified applicant pool benchmark (47.26%).

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD 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) below.

a. New Hires to SES (PWTD)

Answer: No

Response: The percentage of PWTD among new hires for SES (0.00%) was above the qualified applicant pool benchmark (0.00%).

b. New Hires to GS-15 (PWTD)

Answer: Yes

Response: The percentage of PWTD among new hires for the GS-15 (0.00%) fell below the qualified applicant pool benchmark (2.24%).

c. New Hires to GS-14 (PWTD)

Answer: Yes

Response: The percentage of PWTD among new hires for the GS-14 (1.89%) fell below the qualified applicant pool benchmark (2.39%).

d. New Hires to GS-13 (PWTD)

Answer: Yes

Response: The percentage of PWTD among new hires for the GS-13 (2.63%) fell below the qualified applicant pool benchmark (2.26%).

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) below.

a. Executives

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWD) | Answer: N/A |
| II. Internal Selections (PWD)          | Answer: N/A |

Response: Applicant flow data for Executives is not available.

b. Managers

- |  |             |
|--|-------------|
| I. Qualified Internal Applicants (PWD) | Answer: N/A |
| II. Internal Selections (PWD)          | Answer: N/A |

Response: Applicant flow data for Managers is not available.

c. Supervisors

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

Response: The percentage of PWD amongst the internal Supervisor selectees (69.23%) was below the qualified applicant pool benchmark (74.22%).

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.

a. Executives

- |   |             |
|---|-------------|
| I. Qualified Internal Applicants (PWTD) | Answer: N/A |
| II. Internal Selections (PWTD)          | Answer: N/A |

Response: Applicant flow data for Executives is not available.

b. Managers

- |   |             |
|---|-------------|
| III. Qualified Internal Applicants (PWTD) | Answer: N/A |
| IV. Internal Selections (PWTD)            | Answer: N/A |

Response: Applicant flow data for Managers is not available.

- c. Supervisors

III. Qualified Internal Applicants (PWTD)      Answer: Yes

#### IV. Internal Selections (PWTD) Answer: Yes

Response: The percentage of PWTD among Supervisor qualified internal applicants (4.99%) was below the relevant applicant pool benchmark (5.44%). The percentage of PWTD amongst the internal selectees for Supervisor (3.53%) was below the qualified applicant pool benchmark (4.99%).

**Note:** The relevant applicant pool is the PWD/PWTD applicants who voluntarily identified their disability status.

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) below.



Response Applicant flow data for Executives is not available.



Response: Applicant flow data for Managers is not available.



Response: The percentage of PWD among new hires for Supervisors (44.44%) fell below the qualified applicant pool benchmark (48.49%).

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) below.



Response: Applicant flow data for Executives is not available.

- b. New Hires for Managers (PWTD) Answer: N/A

Response: Applicant flow data for Managers is not available.

Response: The percentage of PWTD among new hires for Supervisors (0.00%) fell below the qualified applicant pool benchmark (2.44%).

## 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 workforce 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)
- b. Involuntary Separations (PWD)

Answer: Yes

Answer: Yes

Response: The inclusion rate for PWD (8.01%) exceeded the rate of persons with no disability (7.92%) for voluntary separations.

The inclusion rate for PWD (0.61%) exceeded the rate of persons with no disability (0.28%) for involuntary separations.

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

- a. Voluntary Separations (PWTD)
- b. Involuntary Separations (PWTD)

Answer: Yes

Answer: Yes

Response: The inclusion rate for PWTD (8.06%) exceeded the rate of persons with no disability (7.92%) for voluntary separations.

The inclusion rate for PWTD (1.21%) exceeded the rate of persons with no disability (0.28%) for involuntary separations.

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

Response: Analysis of the PWD/PWT responses in the exit interview results showed that 29.76% of the motivation for leaving the agency was "Organizational Culture"; 25.60% was due to "Work/Life Balance"; and 16.67% was for "Career Advancement."

## **B. Accessibility of Technology and Facilities**

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

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

Response: Internet address: <https://www.hud.gov/accessibility>

How to file a complaint: Contact the Office of Departmental Equal Employment Opportunity (ODEEO) at [EEO@hud.gov](mailto:EEO@hud.gov).

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

Response: Internet address: <https://www.hud.gov/accessibility>

An ABA complaint can be filed using the methods below:

1. Online ABA Complaint Form: <https://access-board.force.com/>
2. E-mail: [enforce@access-board.gov](mailto:enforce@access-board.gov)
3. Fax: 202-272-0081
4. Mail: U.S. Access Board, 1331 F Street, NW, Suite 1000, Washington, DC 20004
3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

Response: The Office of the Chief Information Officer (OCIO) is in the process of revamping the program office to include updated software, policy, and guidance for the 508 compliance and assistive technology program.

### **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 provided final determinations on 600 reasonable accommodation requests in FY 2023. Out of those final determinations, 32.67% were closed within 30 days, and HUD's average processing days were 100.35 days from start to finish. Please note that these average time frames do not include delays outside of the Agency's control, such as delays in providing medical documentation or waiting for equipment to be delivered. Data regarding these types of delays outside of the Agency's control is currently not readily available on a cumulative basis in HUD's current reasonable accommodation case management system.

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 requests for trends.

Response: During FY 2023, the Reasonable Accommodation Branch hosted listening sessions for HUD program offices to understand manager's concerns and needs as well as answer questions about the reasonable accommodation (RA) process. The current RA processes, and standard operating procedures and templates were developed to assist case managers in processing RA cases. Data/Statistics about accommodations granted were provided to inform component managers. Information about the Pregnancy Workers Fairness Act was posted on HUD's website and displayed on the agency's electronic bulletin boards. Additionally, training was provided on telework and remote work as a reasonable accommodation.

Also, in FY 2023, new RA training for managers was developed and will be rolled out during FY 2024. On a biweekly basis, the RA Branch provides onboarding employees RA training during HUD's New Employee Orientation session. Reasonable accommodation training is provided on a one-on-one basis to managers and employees when processing specific accommodation requests.

#### **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 for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Response: PAS request was processed timely. PAS was provided once during FY 2023. HUD will start the process for PAS procurement in FY 2024 to maintain the services.

#### **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

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 2023.

##### **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

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

Answer: Yes

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: The agency took the following corrective measures: posted the notice of discrimination for 60 days on the Program Office's bulletin boards and emailed to all employees, provided 2 hours of EEO training focused on the reasonable accommodation process to all supervisors and managers within the office where the finding of discrimination took place; and paid compensatory damages and attorney's fees to the complainant.

## **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 PWT?

Answer: No

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

Answer: N/A

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 (J1) (FY 2021) – CLOSED

Trigger 1	In FY 2021, PWD in Grade Cluster GS-11 to SES was below the federal benchmark of 12.00% at 11.85%	
Barrier(s)	N/A	
Objective(s)	1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process 2. Develop Action Plan based on barrier analysis results	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Lori Michalski, Chief Human Capital Officer Office of Administration		Yes
Wayne Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		No
Sources of Data		Sources Reviewed? (Yes or No)
Workforce Data Tables		Yes
The participation rates for PWD in grade cluster GS-11 to SES were as follows:		<ul style="list-style-type: none"> <li>• 13.30% for FY 2023</li> <li>• 12.74% for FY 2022</li> <li>• 11.85% for FY 2021</li> <li>• 11.05% for FY 2020</li> </ul>
Complaint Data (Trends)		No
Grievance Data (Trends)		No
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		No
Climate Assessment Survey (e.g., FEVS)		No
Exit Interview Data		No
Focus Groups		No
Interviews		No

Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.	Yes	11/07/2022	09/30/2023
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.	Yes	09/30/2023	12/20/2022
09/30/2023	Interview with Special Employment Program Manager to gain insight into the increased participation rates of hiring PWD and PWTd.	Yes		09/30/2023
Fiscal Year	Accomplishments			
2023	Conducted soft launch of the SF-256 resurvey campaign to encourage employees to update their disability status.			
2023	Established regularly scheduled meetings with barrier analysis working group to identify triggers and potential barriers for PWD and PWTd.			
2023	Met with the Special Employment Program Manager who indicated agency partnerships with Gallaudet University, Operation Warfighter for disable Veterans, and State Vocational Rehabilitation Centers to encourage the increase of participation of PWD and PWTd.			
2022	Convened Barrier Analysis Working Group to begin the Barrier Analysis Process.			
2022	Scheduled and convened barrier analysis meeting to discuss objectives and strategies to investigate the potential barrier.			

## Trigger 2 (J2) (FY 2022)

Trigger 2	<p>In FY 2022, the percentage of PWD New Hires (2.13%) in the MCO 301 CPD Specialist/Representative, is below the benchmark of qualified applicants at 3.49%.</p> <p>In addition, the percentage of PWTD New Hires (0.00%) in the MCO 360 Equal Opportunity Specialist is below the benchmark of qualified applicants at 2.55%.</p>	
Barrier(s)	N/A	
Objective(s)	<ol style="list-style-type: none"> <li>1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process</li> <li>2. Develop Action Plan based on barrier analysis results</li> </ol>	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Lori Michalski, Chief Human Capital Officer Office of Administration		Yes
Wayne Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data		Sources Reviewed? (Yes or No)
Workforce Data Tables		<p>Identify Information Collected</p> <p>FY2023, the percentage of PWD (25.58%) selected externally for MCO 0301 positions was below the percentage of PWD (44.94%) who were externally qualified for MCO 0301 positions.</p> <p>Also, in FY2023 the percentage of PWTD (0.00%) selected externally for MCO 0360 was below the percentage of PWTD (2.45%) who were externally qualified for MCO 0360 positions.</p> <p>FY 2022, the percentage of PWD (2.13%) selected externally for MCO 0301 positions was below the percentage of PWD (3.49%) who were externally qualified for MCO 0301 positions.</p> <p>Also, in FY 2022, the percentage of PWTD (0.00%) selected externally for MCO 0360</p>

		positions was below the percentage of PWT (2.55%) who were externally qualified for MCO 0360 positions.			
Complaint Data (Trends)		No			
Grievance Data (Trends)		No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		No			
Climate Assessment Survey (e.g., FEVS)		No			
Exit Interview Data		No			
Focus Groups		No			
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No			
Other (Please Describe)		No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2024	Continue barrier analysis process to identify where in the employment cycle participation of PWD/PWT is impacted.	Yes			
09/30/2024	Increase awareness of special hiring authorities for PWD/PWT by conducting informational sessions for hiring managers.	Yes			
09/30/2023	Identify specific objectives, strategies, and action steps to complete barrier analysis.	Yes		09/30/2023	
09/30/2023	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.	Yes		12/20/2022	
Fiscal Year	Accomplishments				
2023	Conducted soft launch of the SF-256 resurvey campaign to encourage employees to update their disability status.				

2023	The barrier analysis team partnered with OCHCO to obtain and review applicant flow data for 0301 series.
2023	Continued to meet regularly with barrier analysis working group to identify triggers and potential barriers.

### Trigger 3 (J3) (FY 2023)

Trigger 3	PWD/PWTD separated from the agency at rates above the inclusion rate.	
Barrier(s)	N/A	
Objective(s)	<ol style="list-style-type: none"> <li>1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process</li> <li>2. Develop Action Plan based on barrier analysis results</li> </ol>	
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)	
Lori Michalski, Chief Human Capital Officer Office of Administration	Yes	
Wayne A. Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)	Yes	
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)	
No	No	
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p>Examination of the B14 table showed that the inclusion rate for PWD (8.01%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).</p> <p>The inclusion rate for PWD (0.61%) also exceeded the inclusion rate for people with no disability in involuntary separations (0.28%).</p> <p>The B14 also revealed that the inclusion rate for PWTD (8.06%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).</p>

		The inclusion rate for PWT (1.21%) also exceeded the inclusion rate for people with no disability in involuntary separations (0.28%).		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	Yes	<p>Analysis of the PWD/PWT responses in the exit interviews showed that:</p> <ul style="list-style-type: none"> <li>• 29.76% of the motivation for leaving the agency was “Organizational Culture”</li> <li>• 25.60% was due to “Work/Life Balance” and</li> <li>• 16.67% was for “Career Advancement”</li> </ul>		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2025	Review and conduct analysis of exit survey data to determine if there are any barriers within the agency causing PWD/PWT to separate at rates higher than their inclusion rate.	Yes		
Fiscal Year	Accomplishments			

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

Response: In FY 2023, all planned activities were completed in a timely manner.

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

Response: Participation rates for PWD has increased over the last three fiscal years; from 12.44% in FY2021 to 13.67% in FY 2023, exceeding the government-wide goal of 12.00%.

Participation rates for PWTd slightly increased over the last three fiscal year; from 2.85% in FY 2021 to 2.95% in FY 2023, exceeding the government-wide goal of 2.00%.

The number of non-competitive Schedule A hires for qualified PWTd increased from 56.82% in FY2022 to 66.67% in FY2023 due to training Managers, HR representatives, and recruiters on schedule A, disability, and other special hiring authorities.

3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Response: The planned activities corrected the identified triggers. HUD will continue to partner with our internal and external stakeholders to execute the remaining planned activities, identify triggers and eliminate any potential barriers identified in the workforce for PWD and PWTd.



**Prepared by The Office of Departmental Equal Employment Opportunity**  
EEO@HUD.gov

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
451 7th Street, S.W., Washington, DC 20410