



The Federal Agency Annual EEO Program Status Report (FY 2024 MD-715)



EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

FY 2024 MD-715

Parts A Through E

Part A - Department or Agency Identifying Information

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

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	8,653	203	8,856

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

Agency Leadership	Name	Title
Head of Agency	Matthew E. Ammon	Interim 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	Matthew E. Ammon	Interim Deputy Secretary, Matthew.E.Ammon@hud.gov
Principal EEO Director/Official	Wayne A. Williams	Director, Office of Departmental Equal Employment Opportunity (ODEEO), ES-0260-00, Wayne.A.Williams@hud.gov
Office of Departmental Equal Employment Opportunity (ODEEO)	Tonya P. Watson	Division Director, ODEEO, GS-0260-15, Tonya.P.Watson@hud.gov

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EEO Program Staff	Name	Title, Occupational Series, Pay Plan and Grade, Email Address
Complaint Processing Program Manager	Rodney M. Cox	Deputy Director, ODEEO, GS-0260-15, Rodney.M.Cox@hud.gov
Human Resource Specialist	Shirley Robinson	Human Resource Advisor, OCHCO, GS-0201-14, Shirley.V.Robinson@hud.gov
Reasonable Accommodation Program Manager	April Branch-Snead	Acting Division Director, Reasonable Accommodations Branch (RAB), OCHCO, GS-0201-15, April.N.Branch@hud.gov
Anti-Harassment Program Manager	Alejandro Hernandez	Director, GS-0301-15, OCHCO, Alejandro.Hernandez@hud.gov
ADR Program Manager	Jose A. Flores	ADR Coordinator, ODEEO, GS-0260-13, Jose.A.Flores@hud.gov
Principal MD-715 Preparer	Rushelle A. Wilson	Equal Employment Specialist, ODEEO, GS-0260-14, Rushelle.A.Wilson@hud.gov
Other EEO Staff	Lutheria N. Peters	Data Scientist, ODEEO, GS-1560-14, Lutheria.N.Peters@hud.gov

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 (xxxxx)
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.

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Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	No	HUD is awaiting the launch of the FY 2026-2030 HUD Strategic Plan development cycle to create a plan that will reflect the current Administration's priorities.
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	Included in the Reasonable Accommodations Procedures.
Alternative Dispute Resolution Procedures	Yes	

In the table below, the agency may decide whether to submit these documents with its MD-715 report.

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	

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PART E – EXECUTIVE SUMMARY

MISSION

The U.S. Department of Housing and Urban Development (HUD, Department, or Agency) 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 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 (9) mission critical occupations (MCOs) within the agency. The occupations are critical to ensuring the agency can carry out its mission. The mission critical occupations at HUD are:

1. 0101 Social Science Analyst
2. 0110 Economist
3. 0201 Human Resource Specialist
4. 0301 Community Planning and Development (CPD) Specialist or CPD Representative
5. 0360 Equal Opportunity Specialist
6. 0511 Auditor
7. 1101 Multi-Family Housing Specialist, Portfolio Manager, 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.

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


I, Wayne A. Williams 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. 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)	<div style="background-color: #cccccc; padding: 10px; border: 1px solid #000;">03/18/2025</div>
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Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Date

 Matthew E. Ammon, performing the Delegable Duties of the Deputy Secretary, as Delegated by the Secretary of the Department of Housing and Urban Development (HUD)	<div style="background-color: #cccccc; padding: 10px; border: 1px solid #000;">3/28/2025</div>
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Signature of Agency Head or Agency Head Designee

Date

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MD-715 - PART G

Agency Self-Assessment Checklist

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to the EEOC upon request.

The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).

For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "Yes/No" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.

A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.

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MD-715 - PART G

Agency Self-Assessment Checklist

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.			
Compliance Indicator	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 2024 EEO policy statement was issued on March 27, 2024; however, it is inconsistent with the current Administration’s Executive Orders. The updated policy statement is currently in the departmental clearance process for final signature and issuance.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex, genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	

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Compliance Indicator	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, 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	https://www.hud.gov/program_office/s/administration/hudclips/handbooks/admh/7855.1
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	During FY 2024, the EEO complaint process was presented to employees during 24 of the New Employee Orientation sessions, which were

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			held on a biweekly basis. In addition, 11 training sessions on the EEO complaint process were presented to Agency employees.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “Yes”, please provide how often.	Yes	The ADR policy statement is provided on an annual basis
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “Yes”, please provide how often.	Yes	In FY 2024, the Reasonable Accommodations Branch (RAB) developed and provided new RA training for managers and supervisors throughout the year upon request and provided RA information bi-weekly to new employees during new employee orientation.
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	Anti-harassment training was provided to supervisors three times in FY 2024.
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	Anti-harassment training was provided to supervisors three times in FY 2024.
Compliance Indicator	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	Yes	Employees are recognized annually for EEO Excellence.

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	employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “Yes”, provide one or two examples in the comments section.		
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	
<p style="text-align: center;">Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION 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.</p>			
Compliance Indicator	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	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)]	Yes	
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.	N/A	The EEO Director reports to the agency head.
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	Yes	

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	EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "Yes", please provide the date of the briefing in the comments column.	Yes	The State of the Agency briefing was presented to the head of the agency on July 10, 2024, and senior management officials on August 16, 2024.
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	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 programs 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	

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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	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 principles? [see MD-715, II(B)] If "Yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	HUD Strategic Goals: Goal 3: Proactively prevent discrimination on the bases of race, color, national origin, religion, sex, age, reprisal, genetic information, and disability. Eliminate barriers that impede free

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			and open competition in the workplace.
Compliance Indicator	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	

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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 programs? [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	

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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	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.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 with 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	

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Compliance Indicator	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.6.a	Are senior managers involved in the implementation of Non-discriminatory Programs?	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	
<p style="text-align: center;">Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</p> <p style="text-align: center;">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.</p>			
Compliance Indicator	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	EEO Activity briefings were conducted with every program (component) and regional office in the 2 nd and 4 th quarters.

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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	EEO Activity briefings were conducted with every program (component) and regional office in the 2 nd & 4 th quarters.
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes	
Compliance Indicator	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
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	Yes	

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	Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		
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 <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , 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	

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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	In FY 2024, the average processing time was 60.6 days. The percentage of timely-processed requests was 45.97%. See H2
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	Procedures For Providing Reasonable Accommodation (7855.1) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
Compliance Indicator	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	Yes	

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	evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?		
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 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	Yes	

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	Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]		
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
Compliance Indicator	C.4 – The agency ensures effective coordination between its EEO 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	

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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	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 <u>Douglas v. Veterans Administration</u> , 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	Yes	During FY 2024, there were zero (0) employees disciplined or sanctioned for discriminatory conduct.

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	disciplined/sanctioned individuals during this reporting period in the comments.		
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	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, and barrier analysis plans 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 two (2) EEO Activity 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	
<p style="text-align: center;">Essential Element D: PROACTIVE PREVENTION</p> <p style="text-align: center;">This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</p>			
Compliance Indicator	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments

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D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; union; program evaluations; reasonable accommodation program; and/or anti-harassment program? [see MD-715 Instructions, Sec. I]	Yes	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
Compliance Indicator	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys,	Yes	HUD regularly reviews complaint/grievance data, exit

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	employee climate surveys, focus groups, union, program evaluations, anti-harassment program, and/or reasonable accommodation program? [see MD-715 Instructions, Sec. I] If “Yes”, please identify the data sources in the comments column.		surveys, employee climate surveys, focus groups, program evaluations, anti-harassment program, and reasonable accommodation program.
Compliance Indicator	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	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	https://www.hud.gov/program_office/s/eo/action_plans_0

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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	
<p style="text-align: center;">Essential Element E: EFFICIENCY</p> <p style="text-align: center;">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.</p>			
Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	

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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(I)? If so, please provide the average processing time in the comments.	Yes	The average processing time for issuance of acceptance/dismissal decisions was 27.17 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?	Yes	
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)?	N/A	The agency timely completes investigations.
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.

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E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
Compliance Indicator	E.2 – The agency has a neutral EEO process.	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.

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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, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	
Compliance Indicator	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	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 available during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	

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E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
Compliance Indicator	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	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	

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E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
Compliance Indicator	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	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 report 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 2024, 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	
<p style="text-align: center;">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.</p>			

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Compliance Indicator	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	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	

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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	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	

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

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

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

H.1 Statement of Model Program Essential Element Deficiency (CLOSED)

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) The agency's organizational chart does not clearly define the reporting structure for the EEO office under the Secretary. (B.1.a.2)

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		03/27/2024

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Capital Officer (OCHCO), Office of Administration	Lori Michalski	Yes

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

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2024	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 show the EEO office reporting directly to the agency head (Secretary of HUD). (B.1.a.2)	Yes		09/30/2024

Report of Accomplishments

Fiscal Year	Accomplishments
2024	The delegation of authority for ODEEO was updated in the Federal Register/ Vol. 89, No. 60/ Wednesday, March 27, 2024. The revision states that the ODEEO Director will be under the direct supervision of the agency head. (B.1.a – In Compliance)
2024	ODEEO, OCHCO, and the Office of General Counsel (OGC) met to develop an action plan to ensure compliance with the Elijah Cummings Act.
2023	Met with OGC to engage in meaningful discussions on the importance of the EEO office reporting directly to the agency head.

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H.2 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 accommodations (RA) procedures (30 days) (C.2.b.5)	09/30/2024	09/30/2025	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Reasonable Accommodations Branch Chief (RAB)	April Branch-Snead	Yes
Chief Human Capital Officer	Lori Michalski	Yes

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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 time of reasonable accommodation cases, the Reasonable Accommodations Branch (RAB) plans to onboard 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 deadlines in those offices	Yes	09/30/2025	
09/30/2023	Partner with the Office of General Counsel in FY 2024 to develop new training for supervisors, which will reiterate expectations for timely processing of cases.	Yes	09/30/2024	09/30/2024

Report of Accomplishments

Fiscal Year	Accomplishments
2024	Eliminated the backlog of reconsideration requests pending with the Reasonable Accommodation Committee and changed the process so requests will be heard timely.
2024	Created and presented a Lunch and Learn series on various topics regarding disabilities. We had five sessions with up to 1013 virtual attendees.
2024	Presented approximately 11 HUD-wide training courses (not counting Lunch and Learn sessions) as well as specific targeted training to employees, supervisors, and managers regarding processing reasonable accommodation requests.

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2024	Posted guidance on the Reasonable Accommodations internal webpage, including Assistance with Service Animals for Employees and Providing Urgent Maternal Protections for Nursing Mothers (PUMP) Act guidance.
2024	Created and implemented templates for all the notifications that the Reasonable Accommodations Branch sends out to employees and managers, which resulted in standardized, professional looking documents that are consistent among the Case Managers.
2023	The Reasonable Accommodations Branch (RAB) onboarded two (2) new Reasonable Accommodations case managers in FY 2023. Additionally, a new RAB Chief was onboarded in January 2023.

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H.3 Statement of Model Program Essential Element Deficiency (**CLOSED**)

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	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 Williams	Yes
Acting Director, Equal Employment Opportunity Division, ODEEO	Paulette Lee	Yes

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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
09/30/2024	Transition to the new tracking system to streamline the procedures	Yes		06/28/2024
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
09/30/2022	Standardize SOPs for the internal processing of EEO complaints	Yes	02/26/2023	09/30/2023

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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	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. (<i>Part G – E.4.a.1</i>)	Yes	06/30/2021	09/23/2021
09/30/2020	Continuously review EEO investigation processing to improve efficiency and thoroughness. (<i>Part G – E.1.f</i>)	Yes	09/30/2021	09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
2024	Transitioned to Entellitrak Equal Employment Opportunity (ETK EEO), a new case management complaint tracking system.
2024	Completed all investigations within 180 days.
2024	Hired a FAD writer in July 2024.
2024	The ODEEO completed the final agency decisions within prescribed timeframes.
2023	Acquired new EEO Complaint processing vendor to process complaints.

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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 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 review EEO investigation processing to improve efficiency and thoroughness.
2021	Timely filled the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO.
2021	Awarded a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions.
2020	Continuing to work toward improving complaint processing to timely complete investigations and FADs.
2020	HUD hired two key EEO personnel in FY 19 instrumental to ensuring timely and efficient EEO complaint processing. First, HUD hired a new Team Lead to assist with the implementation of an effective EEO complaint management system that consistently ensures quality and efficient EEO complaint processing. In addition, HUD hired an EEO Program Analyst to advise on the effectiveness and efficiency of HUD's EEO complaint tracking system, identify deficiencies and recommend solutions.
2019	FAD issuance remained within the statutory timeframe for the second year in a row. HUD's FY 19 average FAD issuance rate was 59 days.
2017	A new EEO Division Director was hired in February 2017 and a new Team Leader was assigned.
2017	Increased staff accountability by inserting new elements on performance plans.

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H.4 Statement of Model Program Essential Element Deficiency (**CLOSED**)

Type of Program Deficiency	Brief Description of Program Deficiency
Essential Element E: Efficiency	Low participation rate in ADR process.

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 Williams	Yes
Acting Director, Equal Employment Opportunity Division, ODEEO	Paulette Lee	Yes

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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. (<i>Activity recommended by EEOC via 09/02/2020 Technical Assistance Letter</i>)	Yes	09/30/2023	09/30/2023
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 the 09/02/2020 Technical Assistance Letter)	Yes	09/30/2024	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	Yes	03/31/2023	09/30/2022

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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	regarding resources and process to resolve informal EEO complaints.			
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
2024	The ADR participation rate increased from 15.00% in FY 2023 to 36.00% in FY 2024, with a 100.00% offer rate.
2024	Created a whiteboard animation to explain the EEO process to agency employees. The whiteboard animation video was presented to all HUD senior leadership and a link to the video was shared for leaders to distribute to their employees.
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.

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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 FY 2018. This tool is also being used to develop effective training for employees, supervisors, and managers during FY 2019.
2018	HUD conducted a review of the ADR program to analyze data and provide recommendations for program enhancement.
2017	In September 2017, HUD produced two videos on the benefits of the ADR program and promoted ADR during its annual EEO conference.

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MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier

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

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

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MD-715 – Part J

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. Both grade level clusters for PWD are above the 12.00% benchmark. Grade level cluster GS-1 to GS-10 is 22.06% and grade level cluster GS-11 to SES is 14.18%.

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. Both grade level clusters for PWTD are above the 2.00% benchmark. Grade level cluster GS-1 to GS-10 is 4.08% and grade level cluster GS-11 to SES is 3.14%.

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

Response: In FY 2024, the agency communicated the numerical goals during the EEO activity briefings with the senior leaders and hiring officials of each Program Office and all 10 of HUD's Regional Offices. In addition, this information is provided to Administrative Officers and Hiring Officials by various Human Resources professionals during various phases of the hiring process.

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 accommodations 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

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- 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

HUD's digital access program plans to add one (1) FTE plus additional contract support in FY 2025. HUD plans to leverage details, contract support, and other arrangements to bolster resources during the FY.

- 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	
Review and consult Administrative Officers and Hiring Managers about applications received for noncompetitive consideration from PWD and PWTD	1	0	15	Shirley Robinson, Human Resource Advisor, OCHCO, Shirley.V.Robinson@hud.gov
Educate and respond to all inquiries from candidates about Schedule A hiring	1	0	0	Shirley Robinson, Human Resource Advisor, OCHCO, Shirley.V.Robinson@hud.gov
Processing reasonable accommodation requests from applicants and employees	7	0	0	April Branch-Snead, Acting Reasonable Accommodations Branch Chief, OCHCO, April.N.Branch@hud.gov
Section 508 Compliance	0	0	1.5	Paul A. Scott, Business Change & Integration Officer, OCIO; Acting Section 508 Program Manager, Paul.A.Scott@hud.gov
Architectural Barriers Act Compliance	0	0	10	Rex J. Pace, ABA Coordinator, FHEO, Rex.J.Pace@hud.gov
Processing assistive technology accommodation requests from applicants and employees	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, Jeffrey.L.Salit@hud.gov

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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 Accommodations Branch (RAB) has received the following training in FY 2024: Reviewing Medical Documentation; NELI’s ADA Workshop; Workplace Accommodations by Job Accommodation Network (JAN); Opening Our Eyes to a World Beyond Sight: Navigating Blindness and Low Vision; Service Animals vs Emotional Support Animals; Accommodating Employees with Intellectual Disabilities; Accommodating Employees with various Cognitive and Neurological Needs; and Pregnant Workers Fairness Act Training. The RAB staff have also individually taken the following courses: Disability Program Manager Basics; Proofreading Skills for Government Employees; Effective Writing Training for Government Employees; Federal Writing Bootcamp; and Briefing and Presentation Skills.

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 Recruitment and Staffing Division (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.

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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: There are two main ways that candidates may receive consideration for a Schedule A appointment. One way is that candidates may apply to HUD's merit promotion vacancies posted on USAJOBS to be considered noncompetitively for vacancies that he or she meet the qualifications. The other ways candidates may be considered is to send their resume, Schedule A Letter, and transcript if applicable to Recruitment@hud.gov to be uploaded in the Schedule A Resume Database for future consideration by Program Offices. Candidate's documents are verified for appropriateness as proof of meeting the requirements for disability supporting documentation issued by licensed medical professionals, vocational rehabilitation specialist or any Federal or state agency to determine eligibility. Often there are times that a Program Office may reach out to ask if there are any available candidates that meet the qualifications of a position to be filled. On several occasions, candidates are found at recruitment events. When there is a potential match for a candidate and the position to be filled is identified, the candidate's resume is sent to the appropriate Program Office for consideration.

Selecting officials and Administrative Officers are invited to attend various training sessions on how the Schedule A hiring authority can be used, and an additional overview of the Schedule A hiring process is provided to Program Office Officials when a Schedule A appointment hire is requested.

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 Schedule A hiring authority training that selecting officials receive; ad-hoc training was also provided to all Program Office hiring managers and

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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 PWTD, in securing and maintaining employment.

Response: HUD will continue to partner with Gallaudet University, and other University Student Disability Affairs Offices to reach students eligible for Schedule A hiring. HUD works with various Vocational Rehabilitation Counselors to hire disabled Veterans in the Non-Paid Work Experience Program which is a resource to recruit and hire PWD and PWTD. In addition, some Program Offices are proactive with working closely with HUD and various disability organizations to promote HUD as an employer of choice for PWD and PWTD.

C. Progression Towards Goals (Recruitment and Hiring)

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

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

Response: No triggers exist for PWD and PWTD among new hires in the permanent workforce. New hires for PWD are 15.36%, which is above the 12.00% benchmark. New hires for PWTD are 2.81%, which is above the 2.00% benchmark.

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

New Hires for MCO 0301 (PWD)	Answer: No
New Hires for MCO 0301 (PWTD)	Answer: Yes

Response: No triggers exist for PWD among New Hires. New Hires for PWTD are 0.00%, which is below the benchmark for qualified applicants at 2.37%.

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

Response: New Hires for PWD are 33.33%, which is below the benchmark for qualified applicants at 45.25%. New Hires for PWTD are 0.00%, which is below the benchmark for qualified applicants at 2.64%.

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New Hires for MCO 1101 (PWD)	Answer: Yes
New Hires for MCO 1101 (PWTD)	Answer: Yes

Response: New Hires for PWD are 0.00%, which is below the benchmark for qualified applicants at 30.23%. New Hires for PWTD are 0.00%, which is below the benchmark for qualified applicants at 1.28%.

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

Response: Qualified Applicants for PWTD are 4.32%, which is slightly below the relevant benchmark for applicants at 4.43%.

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

Response: No triggers identified.

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

Response: Qualified Applicants for PWTD are 1.57%, which is slightly below the relevant benchmark for applicants at 2.38%.

Note: The relevant applicant pool is the percentage of PWD/PWTD that applied compared to the qualified applicants.

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 52.73%, which is below the benchmark for qualified applicants at 66.78%. Internal Promotions for PWTD are 1.82%, which is below the benchmark for qualified applicants at 4.32%.

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

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Response: Internal Promotions for PWD are 50.00%, which is below the benchmark for qualified applicants at 65.37%. Internal Promotions for PWTD are 5.00%, which is also below the benchmark for qualified applicants at 8.36%.

Promotions for MCO 1101 (PWD)

Answer: Yes

Promotions for MCO 1101 (PWTD)

Answer: Yes

Response: Internal Promotions for PWD are 61.36%, which is slightly below the benchmark for qualified applicants at 64.58%. Internal Promotions for PWTD are 0.00%, which is below the benchmark for qualified applicants at 1.57%.

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 PWTD, 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 recruitment, hiring, 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 2024, 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 2024, we offered a new program, the Soar Academy, which is a voluntary 12-session program to build the competencies of two cohorts (GS-5 through GS-10 and GS 11-12) of HUD employees. Soar Academy was created to cultivate a cohort of high-potential, early and mid-career professionals through an immersive learning program.

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Furthermore, HUD's open-enrollment training programs from Talent Development and Workforce Planning (TDWP) 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		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	2,235	27	155 7.00%	4 15.00%	71 3.00%	1 4.00%
Fellowship Programs	1,032	7	1 1.00%	1 14.00%	0 0.00%	0 0.00%
Mentoring Programs	5	0	0 0.00%	0 0.00%	0 0.00%	0 0.00%
Coaching Programs	115	70	13 11.400%	13 19.00%	3 3.00%	3 4.00%
Training Programs	20	13	8 40.00%	5 38.00%	3 15.00%	1 8.00%
Detail Programs	183	72	36 20.00%	16 22.00%	11 6.00%	3 4.00%
Other Career Development Programs	0	0	0 0.00%	0 0.00%	0 0.00%	0 0.00%

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 applicants for all career development programs was below the relevant applicant pool benchmark. The percentage of PWD selectees for all career development programs was below the applicant pool benchmark.

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 (PWTD) **Answer: Yes**
b. Selections (PWTD) **Answer: Yes**

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Response: The percentage of PWD applicants for all career development programs was below the relevant applicant pool benchmark. The percentage of PWD selectees for all career development programs was below the applicant pool benchmark.

Note: The relevant applicant pool is the total applicants in each career development program.

C. Awards

1. 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 (PWTD) | Answer: Yes |

Response: When comparing PWD and PWTD with people with no disability (PWND) a trigger exists. The triggers identified are listed below.

Time Off Awards:

- PWD (13.10%) and PWTD (13.77%) fell slightly below the rate for employees with no disability (15.55%) for time off awards between 1 - 10 hours.
- PWD (9.76%) and PWTD (9.06%) fell slightly below the rate for employees with no disability (11.88%) for time off awards between 11 - 20 hours.
- PWD (7.14%) and PWTD (7.61%) fell below the rate for employees with no disability (9.13%) for time off awards between 21 - 30 hours.
- PWD (10.32%) and PWTD (8.70%) fell below the rate for employees with no disability (15.01%) for time off awards between 31 - 40 hours.

Cash Awards:

- PWD (18.81%) in cash awards, \$500 and under, was below the rate for employees with no disability (19.75%). No trigger exists for PWTD in cash awards \$500 and under. PWTD (20.65%) was above the rate for employees with no disabilities (19.75%).
- PWD (9.60%) and PWTD (9.06%) in cash awards, \$501 - \$999, was below the rate for employees with no disability (12.67%).
- PWD (29.13%) and PWTD (29.71%) in cash awards \$1000 - \$1999, was slightly below the rate for employees with no disability (34.03%).
- PWD (39.76%) and PWTD (42.03%) in cash awards, \$2000 - \$2999, was slightly below the rate for employees with no disability (51.75%).

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- PWD (9.05%) and PWTD (10.14%) in cash awards, \$3000 - \$3999, was below the rate for employees with no disability (15.30%).
 - PWD (2.78%) and PWTD (2.54%) in cash awards, \$4000 - \$4999, was below the rate for employees with no disability (6.25%).
 - PWD (0.24%) and PWTD (0.00%) in cash awards \$5000 or more, was below the rate for employees with no disability (0.54%).
2. Does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) below.
- a. Pay Increases (PWD) **Answer: Yes**
- b. Pay Increases (PWTD) **Answer: Yes**
- Response:** PWD (2.62%) in quality step increases, was below the rate for employees with no disability (4.21%). PWTD (2.90%) in quality step increases, was below the rate for employees with no disability (4.21%).
3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? If “yes”, describe the employee recognition program and relevant data below.
- 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:** Internal Selections for PWD are 0.00%, which is below the benchmark for qualified applicants at 80.00%.
- b. GS-15
- I. Qualified Internal Applicants (PWD) **Answer: No**
- II. Internal Selections (PWD) **Answer: Yes**
- Response:** Internal Selections for PWD are 63.81%, which is slightly below the benchmark for qualified applicants at 72.31%.

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c. GS-14

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

Response: Internal Selections for PWD are 66.67%, which is slightly below the benchmark for qualified applicants at 66.71%.

d. GS-13

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

Response: Internal Selections for PWD are 51.61%, which is slightly below the benchmark for qualified applicants at 62.72%.

Note: The relevant applicant pool is the percentage of PWD that applied compared to the qualified applicants

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 (PWTD) | Answer: No |
| II. | Internal Selections (PWTD) | Answer: Yes |

Response: Internal Selections for PWTD are 0.00%, which is below the benchmark for qualified applicants at 6.67%.

b. GS-15

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

Response: Qualified Internal Applicants for PWTD are 5.90%, below the benchmark for applicants at 7.80%. Internal Selections for PWTD are 1.90%, which is below the benchmark for qualified applicants at 5.90%.

c. GS-14

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

Response: Qualified Internal Applicants for PWTD are 5.87%, below the benchmark for applicants at 6.87%. Internal Selections for PWTD are 5.30%, which is below the benchmark for qualified applicants at 5.87%.

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d. GS-13

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

Response: Qualified Internal Applicants for PWTD are 7.02%, slightly below the benchmark for applicants at 7.27%. Internal Selections for PWTD are 4.99%, which is below the benchmark for qualified applicants at 7.02%.

Note: The relevant applicant pool is the percentage of PWTD that applied compared to the qualified applicants.

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: No trigger identified.

- b. New Hires to GS-15 (PWD) **Answer:** Yes

Response: New Hires for PWD are 41.86%, below the benchmark for qualified applicants at 49.59%.

- c. New Hires to GS-14 (PWD) **Answer:** Yes

Response: New Hires for PWD are 38.20%, below the benchmark for qualified applicants at 41.97%.

- d. New Hires to GS-13 (PWD) **Answer:** Yes

Response: New Hires for PWD are 32.94%, slightly below the benchmark for qualified applicants at 39.40%.

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:** Yes

Response: New Hires for PWTD are 0.00%, below the benchmark for qualified applicants at 5.61%.

- b. New Hires to GS-15 (PWTD) **Answer:** Yes

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Response: New Hires for PWD are 2.33%, below the benchmark for qualified applicants at 4.79%.

- c. New Hires to GS-14 (PWTB) **Answer:** Yes

Response: New Hires for PWTB are 1.12%, below the benchmark for qualified applicants at 4.12%.

- d. New Hires to GS-13 (PWTB) **Answer:** Yes

Response: New Hires for PWTB are 2.35%, below the benchmark for qualified applicants at 3.65%.

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: Internal Selections for PWD are 64.94%, which is below the benchmark for qualified applicants at 70.61%.

Note: The relevant applicant pool is the percentage of PWD that applied compared to the qualified applicants

6. Does your agency have a trigger involving PWTB 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

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- | | | |
|-----|--------------------------------------|--------------------|
| 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: Qualified Internal Applicants for PWTD are 5.60%, below the benchmark for applicants at 7.53%. Internal Selections for PWTD are 3.45%, which is below the benchmark for qualified applicants at 5.60%.

Note: The relevant applicant pool is the percentage of PWTD that applied compared to the qualified applicants

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.

- | | | |
|----|--------------------------------|--------------------|
| a. | New Hires for Executives (PWD) | Answer: N/A |
|----|--------------------------------|--------------------|

Response: Applicant flow data for Executives is not available.

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

Response: Applicant flow data for Managers is not available.

- | | | |
|----|---------------------------------|--------------------|
| c. | New Hires for Supervisors (PWD) | Answer: Yes |
|----|---------------------------------|--------------------|

Response: New Hires for PWD are 42.22%, below the benchmark for qualified applicants at 47.24%.

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.

- | | | |
|----|---------------------------------|--------------------|
| a. | New Hires for Executives (PWTD) | Answer: N/A |
|----|---------------------------------|--------------------|

Response: Applicant flow data for Executives is not available.

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

Response: Applicant flow data for Managers is not available.

- c. New Hires for Supervisors (PWTD) **Answer:** Yes

Response: New Hires for PWTD are 0.00%, below the benchmark for qualified applicants at 4.33%.

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 access to technology and facilities; and (3) provide information on the reasonable accommodations 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. Did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

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

Response: PWD (0.79%) exceeded the rate of persons with no disability (0.21%) for voluntary separations. The rate for PWD (7.14%) did not exceed the rate of persons with no disability (7.70%) for involuntary separations.

3. Did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

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

Response: PWTD (0.36%) exceeded the rate of persons with no disability (0.21%) for voluntary separations. PWTD (6.16%) did not exceed the rate of persons with no disability (7.70%) for involuntary separations.

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

Response: Analysis of the PWD/PWTD responses in the exit interview results showed that 21.43% of the motivation for leaving the agency was Career Advancement; Better Pay and/or Benefits and Organizational Culture was 17.86%; and 14.29% was for Work/Life Balance. Of the PWD/PWTD that left the agency, 46.15% of the respondents indicated that HUD always met their needs as a person with a disability.

B. Access to 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. § 794d), concerning the access of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the access 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: Send an email describing the barrier encountered to 508@hud.gov, who will then route to the appropriate office for intake or investigation. Employees and applicants may also file directly with the Office of Departmental Equal Employment Opportunity (ODEEO) by email at 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
 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 access to agency facilities and/or technology.

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Response: The Office of the Chief Information Officer (OCIO) is in the process of establishing a comprehensive Digital Access Program at HUD. During FY 2024, OCIO conducted presentations to various groups about the importance of and requirements for digital access, including those established by OMB M-24-08. For FY 2025, HUD plans to publish a revised Digital Access / Section 508 Policy, relaunch a digital access executive committee, establish digital access coordinators in each program/functional office, update procurement policies and guidance, begin collecting and documenting the needs of users with disabilities, conduct HUD-wide capacity building events, and require all staff to take a general awareness training about Section 508 requirements.

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 620 reasonable accommodations requests in FY 2024. Out of those final determinations, 45.97% were closed within 30 days, and HUD's average processing days was 60.6 days from start to finish. Please note that these average timeframes do not include delays outside of the Agency's control, such as 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 accommodations 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: In FY 2024, new reasonable accommodations training for managers was rolled out. During FY 2024, the Reasonable Accommodations Branch conducted training for managers focusing on their obligations to provide effective and timely accommodations, and the presenters responded to questions from managers. Additionally, the Reasonable Accommodations Branch Chief participated in a Fireside Chat along with an EEOC Attorney Advisor on the Pregnant Workers Fairness Act (PWFA). The Branch Chief also provided training to all employees and managers focusing on the reasonable accommodations process and new hires.

On a biweekly basis, the RA Branch provides onboarding employees RA training during HUD's New Employee Orientation session. Reasonable accommodations training is provided on a one-on-one basis for managers and employees when processing specific accommodation requests.

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The Reasonable Accommodations Branch updated templates for notifications that supervisors and employees received in order to provide clear processing instructions for reasonable accommodations and to provide information to assist the managers in making decisions for reasonable accommodations. The updates also served to educate employees on what they needed their medical documentation to state to show they have a disability and a nexus or need for an accommodation. The Reasonable Accommodations Branch provided general data to the program offices about accommodations in their specific areas.

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 requests were processed timely. PAS was provided four times during FY 2024. One of the four was due to travel and training, for which the employee secured his own provider. Three out of four requests were provided timely. Additionally, HUD entered into a new PAS contract which was awarded on March 11, 2024.

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: No. Our FY 2024 average was 13.33%, compared to the government-wide average of 28.93%.

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 2024.

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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. Our FY 2024 average was 27.77%, which was above the government-wide average 20.33%.

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: No

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

Answer: N/A

Section VII: Identification and Removal of Barriers

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

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

Answer: No

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

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.

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Trigger 1 (J1) (FY 2022)

Trigger 1	<p>In FY 2022, the percentage of PWD New Hires (2.13%) in the MCO 0301 CPD Specialist/Representative, was below the benchmark of qualified applicants at 3.49%.</p> <p>In addition, the percentage of PWTD New Hires (0.00%) in the MCO 0360 Equal Opportunity Specialist is below the benchmark of qualified applicants at 2.55%.</p>	
Barrier(s)	N/A	
Objective(s)	<p>1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process</p> <p>2. Develop Action Plan based on barrier analysis results</p>	
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)	Identify Information Collected
Workforce Data Tables	Yes	<p><u>FY 2024</u> The percentage of PWD (54.55%) selected externally for MCO 0301 positions was above the percentage of PWD (39.71%) who were externally qualified for MCO 0301 positions.</p> <p>Also, the percentage of PWTD (0.00%) selected externally for MCO 0360 was below the percentage of PWTD (2.64%) who were externally qualified for MCO 0360 positions.</p> <p><u>FY 2023</u> 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>

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		<p>Also, 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><u>FY 2022</u></p> <p>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, the percentage of PWTD (0.00%) selected externally for MCO 0360 positions was below the percentage of PWTD (2.55%) who were externally qualified for MCO 0360 positions.</p>		
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/PWTD is impacted.	Yes	09/30/2026	
09/30/2024	Increase awareness of hiring authorities for PWD/PWTD by	Yes		9/19/2024

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	conducting informational sessions for hiring managers.			
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 goals and accomplishments that will reflect the increase of the participation.	Yes		12/20/2022
Fiscal Year	Accomplishments			
2024	Increased awareness of hiring authorities for PWD/PWTD by conducting informational sessions for employees and managers throughout the fiscal year.			
2024	Provided workshops to all employees focused on understanding the reasonable accommodations process and emergency evacuation preparedness.			
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.			

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Trigger 2 (J2) (FY 2023)

Trigger 2	PWD/PWTD separated from the agency at rates above the rate of PWND.	
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 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><u>FY 2024</u> Examination of the B14 table showed that the rate for PWD (0.79%) exceeded the rate for people with no disability in voluntary separations (0.21%).</p> <p>PWTD (0.36%) also exceeded the rate for people with no disability in voluntary separations (0.21%).</p> <p><u>FY 2023</u> Examination of the B14 table showed that the rate for PWD (8.01%) exceeded the rate for people with no disability in involuntary separations (7.92%).</p> <p>PWD (0.61%) also exceeded the rate for people with no disability in voluntary separations (0.28%).</p>

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		<p>The B14 also revealed that the rate for PWTD (8.06%) exceeded the rate for people with no disability in involuntary separations (7.92%).</p> <p>PWTD (1.21%) also exceeded the rate for people with no disability in voluntary separations (0.28%).</p>			
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><u>FY 2024</u> Analysis of the PWD/PWTD responses in the exit interviews showed that:</p> <ul style="list-style-type: none"> • 17.86% of the motivation for leaving the agency was “Organizational Culture” • 14.29% was due to “Work/Life Balance” • 21.43% was for “Career Advancement” <p><u>FY 2023</u> Analysis of the PWD/PWTD responses in the exit interviews showed that:</p> <ul style="list-style-type: none"> • 29.76% of the motivation for leaving the agency was “Organizational Culture” • 25.60% was due to “Work/Life Balance” • 16.67% was for “Career Advancement” 			
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	<table border="1"> <tr> <td>Sufficient Staffing & Funding (Yes or No)</td> <td>Modified Date (mm/dd/yyyy)</td> <td>Completion Date (mm/dd/yyyy)</td> </tr> </table>	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

09/30/2025	Review and conduct analysis of exit survey data to determine if there are any barriers within the agency causing PWD/PWTD to separate at higher rates.	Yes		
Fiscal Year	Accomplishments			
2024	Reconvened the barrier analysis working group to identify triggers and determine if barriers exist.			

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

Response: In FY 2024, 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 have increased from 13.67% in FY 2023 to 14.56% in FY 2024, exceeding the government-wide goal of 12.00%.

Participation rates for PWTD also increased from 2.95% in FY 2023, to 3.19% in FY 2024, exceeding the government-wide goal of 2.00%.

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 agency continues to see an increase in the participation rate of PWD/PWTD in the workplace. 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.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
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