

FY23



**MD-715 (Part J) Special Program Plan**  
for Recruiting, Hiring, Advancement and  
Retention of Persons with a Disability

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

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

### Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12.00% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) below.
  - a. Cluster GS-1 to GS-10 (PWD)                      Answer: No
  - b. Cluster GS-11 to SES (PWD)                      Answer: No

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

2. Using the goal of 2.00% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) below.
  - a. Cluster GS-1 to GS-10 (PWTD)                      Answer: No
  - b. Cluster GS-11 to SES (PWTD)                      Answer: No

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

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

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

## Section II: Model Disability Program

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

### A. Plan to Provide Sufficient & Competent Staffing for the Disability Program

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

Answer: Yes

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTB	1	0	15	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Shirley Robinson, Special Employment Programs Manager, OCHCO, <a href="mailto:Shirley.V.Robinson@hud.gov">Shirley.V.Robinson@hud.gov</a>
Processing reasonable accommodation requests from applicants and employees	8	0	0	Tammy Lawrence, Branch Chief, OCHCO, <a href="mailto:Tammy.L.Lawrence@hud.gov">Tammy.L.Lawrence@hud.gov</a>
Section 508 Compliance	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>
Architectural Barriers Act Compliance	0	0	10	Rex J. Pace, ABA Coordinator, OGC, <a href="mailto:Rex.J.Pace@hud.gov">Rex.J.Pace@hud.gov</a>
Special Emphasis Program for PWD and PWTB	1	0	0	Rushelle Wilson, Disability Program Manager, ODEEO, <a href="mailto:Rushelle.A.Wilson@hud.gov">Rushelle.A.Wilson@hud.gov</a>
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	1	1	0	Jeffrey Salit, Section 508 Coordinator, OCIO, <a href="mailto:Jeffrey.L.Salit@hud.gov">Jeffrey.L.Salit@hud.gov</a>

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that

disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer: Yes

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

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

## **B. Plan to Ensure Sufficient Funding for the Disability Program**

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

Answer: Yes

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

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

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

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

Response: The RSD will continue to market Schedule A appointment authority to hire PWD and PWTD at all recruitment events attended. In addition, the Pathways Program will be an additional source to hire students with a disability and the various Veteran authorities to hire disabled Veterans. These practices have proven to be successful with the Department reaching the 12.00% goal for PWD and 2.00% goal for PWTD.

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

Response: HUD utilizes a variety of activities to increase the participation rates of PWD and PWTD, to include partnering with Gallaudet University, the Operation Warfighter's program for disabled Veterans, and State Vocational Rehabilitation Centers to recruit and hire qualified PWD and PWTD. In addition, RSD works with the Office of Student Disabilities of various colleges and universities. These partnerships have been developed to educate students about the Schedule A hiring process with HUD. RSD will continue to market Schedule A hiring to Pathways and various Veteran candidates.

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

Response: First, HUD verifies the appropriate proof of disability supporting documentation issued by licensed medical professionals, vocational rehabilitation specialist or any Federal or state agency to determine eligibility. Eligible applicants are then forwarded either by review of the Positional Organization Listing (POL) or at the request of a Program Office for consideration of anticipated positions.

Selecting officials receive quarterly training on how Schedule A hiring authority can be used and they receive an additional overview when reviewing an applicant for consideration using the Schedule A authority. In addition, a Schedule A resume database on SharePoint has been established to give hiring managers easy access to review resumes from PWD for employment opportunities.

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

Answer: Yes

Response: In addition to the quarterly Schedule A hiring authority training that selecting officials receive, HUD also provides ad-hoc training to all Program Office hiring managers and Administrative Officers on hiring authorities and practices to increase HUD's use of the Schedule A hiring authority and Veteran's recruitment programs. These training opportunities are provided virtually to include field managers.

## **B. Plan to Establish Contacts with Disability Employment Organizations**

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

Response: RSD will continue to partner with Gallaudet University, and other University Student Disability Affairs Offices to reach students eligible for Schedule A hiring. RSD work with various Vocational Rehabilitation Counselor to hire disabled Veterans in the

Non-Paid Work Experience Program which is a resource to recruit and hire PWD and PWTD. In addition, HUD continues to partner with Vocational Rehabilitative Services to promote future hiring opportunities 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 15.33%, which is above the 12.00% benchmark. New hires for PWTD are 3.17%, which is above the 2.00% benchmark.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or 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: Yes
New Hires for MCO 0301 (PWTD)	Answer: Yes

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

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

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

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

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

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

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

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

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

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

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

Response: No trigger.

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

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

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

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

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

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

Promotions for MCO 1101 (PWD) Answer: No  
Promotions for MCO 1101 (PWTD) Answer: Yes

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

## Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### A. Advancement Program Plan

Describe the agency's plan to ensure PWD, including 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 the recruitment, hiring, inclusion and advancement of individuals with disabilities.

### B. Career Development Opportunities

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

Response: During FY 2023, HUD offered numerous career development programs and individual training opportunities which are available to all employees or to target groups/grades. HUD maintains centralized programs to support employees at all levels (e.g., Mentoring, Coaching, Rotational Assignments) as well as targeted programs that change from year to year.

In FY 2023, we offered the SES Readiness Program open to GS-14/15 employees with at least one year of supervisory experience; President's Management Council Interagency Rotation Program (PMC) for GS-13/14/15 employees; and the CXO Fellowship Program for GS-9-13. HUD's open-enrollment training programs are consistently full and often reach hundreds of participants. Competitive programs have seating limits or policy-established limits.

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



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

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

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

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

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

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

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

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

### C. Awards

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

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

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

#### Time Off Awards:

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

#### Cash Awards:

- The inclusion rate for PWD (19.67%) in cash awards \$500 and under, was slightly below the inclusion rate for employees with no disability (19.75%). No trigger exists for PWTD in cash awards \$500 and under. The inclusion rate for PWTD (19.76%) was above the inclusion rate for employees with no disability (19.75%).
- The inclusion rate for PWD (9.14%) and PWTD (10.48%) in cash awards \$501 - \$999, was below the inclusion rate for employees with no disability (13.49%).

- The inclusion rate for PWD (42.12%) and PWTD (43.95%) in cash awards \$1000 - \$1999, was below the inclusion rate for employees with no disability (45.13%).
  - The inclusion rate for PWD (37.16%) and PWTD (39.52%) in cash awards \$2000 - \$2999, was below the inclusion rate for employees with no disability (57.25%).
  - The inclusion rate for PWD (3.39%) and PWTD (3.23%) in cash awards \$3000 - \$3999, was below the inclusion rate for employees with no disability (5.96%).
  - The inclusion rate for PWD (2.44%) and PWTD (2.82%) in cash awards \$4000 - \$4999, was below the inclusion rate for employees with no disability (5.38%).
  - The inclusion rate for PWD (0.09%) and PWTD (0.00%) in cash awards \$5000 or more, was below the inclusion rate for employees with no disability (0.22%).
2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) below.

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

Response: The inclusion rate for PWD (3.39%) in quality step increases, was below the inclusion rate for employees with no disability (4.63%). No triggers exist for PWTD in quality step increases. The inclusion rate for PWTD (5.65%) in quality step increases, was above the inclusion rate for employees with no disability (4.63%).

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data 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: The percentage of PWD amongst the SES selectees (0.00%) was below the qualified applicant pool benchmark (89.47%).

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

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

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

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

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

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

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

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

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

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

b. GS-15

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

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

c. GS-14

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

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

d. GS-13

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

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

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

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

- a. New Hires to SES (PWD) Answer: No

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

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

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

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

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

d. New Hires to GS-13 (PWD) Answer: No

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

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer: No

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

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

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

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

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

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

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

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

a. Executives

I. Qualified Internal Applicants (PWD) Answer: N/A

II. Internal Selections (PWD) Answer: N/A

Response: Applicant flow data for Executives is not available.

b. Managers

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

Response: Applicant flow data for Managers is not available.

c. Supervisors

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

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

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

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

a. Executives

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

Response: Applicant flow data for Executives is not available.

b. Managers

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

Response: Applicant flow data for Managers is not available.

c. Supervisors

- III. Qualified Internal Applicants (PWTD) Answer: Yes
- IV. Internal Selections (PWTD) Answer: Yes

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

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

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

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

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

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

Response: Applicant flow data for Executives is not available.

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

Response: Applicant flow data for Managers is not available.

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

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

## Section V: Plan to Improve Retention of Persons with Disabilities

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

### A. Voluntary and Involuntary Separations

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. §



213.3102(u)(6)(i)? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer: Yes

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

- a. Voluntary Separations (PWD) Answer: Yes
- b. Involuntary Separations (PWD) Answer: Yes

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

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

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

- a. Voluntary Separations (PWTD) Answer: Yes
- b. Involuntary Separations (PWTD) Answer: Yes

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

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

4. If a trigger exists involving the separation rate of PWD and/or 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 29.76% of the motivation for leaving the agency was “Organizational Culture”; 25.60% was due to “Work/Life Balance”; and 16.67% was for “Career Advancement.”

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

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

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

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

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

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

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

An ABA complaint can be filed using the methods below:

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

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

### **C. Reasonable Accommodation Program**

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

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

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

currently not readily available on a cumulative basis in HUD's current reasonable accommodation case management system.

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

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

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

#### **D. Personal Assistance Services Allowing Employees to Participate in the Workplace**

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

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

### **Section VI: EEO Complaint and Findings Data**

#### **A. EEO Complaint Data Involving Harassment**

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

Answer: Yes

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

Answer: No

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

Response: There were no findings of discrimination relative to this request during FY 2023.

## **B. EEO Complaint Data involving Reasonable Accommodation**

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

Answer: Yes

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

Answer: Yes

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

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

## **Section VII: Identification and Removal of Barriers**

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

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

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.

## Trigger 1 (J1) (FY 2021) – CLOSED

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

Other (Please Describe)		No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.	Yes	11/07/2022	09/30/2023	
11/01/2022	Develop draft recommendations/ action plan to incorporate into the Agency's Disability Employment Plan with timelines and strategic goal and accomplishments that will reflect the increase of the participation of PWD in GS-11 to SES Grade Clusters.	Yes	09/30/2023	12/20/2022	
09/30/2023	Interview with Special Employment Program Manager to gain insight into the increased participation rates of hiring PWD and PWTD.	Yes		09/30/2023	
Fiscal Year	Accomplishments				
2023	Conducted soft launch of the SF-256 resurvey campaign to encourage employees to update their disability status.				
2023	Established regularly scheduled meetings with barrier analysis working group to identify triggers and potential barriers for PWD and PWTD.				
2023	Met with the Special Employment Program Manager who indicated agency partnerships with Gallaudet University, Operation Warfighter for disable Veterans, and State Vocational Rehabilitation Centers to encourage the increase of participation of PWD and PWTD.				
2022	Convened Barrier Analysis Working Group to begin the Barrier Analysis Process.				
2022	Scheduled and convened barrier analysis meeting to discuss objectives and strategies to investigate the potential barrier.				

## Trigger 2 (J2) (FY 2022)

Trigger 2	<p>In FY 2022, the percentage of PWD New Hires (2.13%) in the MCO 301 CPD Specialist/Representative, is below the benchmark of qualified applicants at 3.49%.</p> <p>In addition, the percentage of PWTD New Hires (0.00%) in the MCO 360 Equal Opportunity Specialist is below the benchmark of qualified applicants at 2.55%.</p>	
Barrier(s)	N/A	
Objective(s)	1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process	
	2. Develop Action Plan based on barrier analysis results	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Lori Michalski, Chief Human Capital Officer Office of Administration		Yes
Wayne Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p>FY2023, the percentage of PWD (25.58%) selected externally for MCO 0301 positions was below the percentage of PWD (44.94%) who were externally qualified for MCO 0301 positions.</p> <p>Also, in FY2023 the percentage of PWTD (0.00%) selected externally for MCO 0360 was below the percentage of PWTD (2.45%) who were externally qualified for MCO 0360 positions.</p> <p>FY 2022, the percentage of PWD (2.13%) selected externally for MCO 0301 positions was below the percentage of PWD (3.49%) who were externally qualified for MCO 0301 positions.</p> <p>Also, in FY 2022, the percentage of PWTD (0.00%) selected externally for MCO 0360 positions was below the percentage of PWTD</p>



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

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

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

<b>Trigger 3</b>	PWD/PWTD separated from the agency at rates above the inclusion rate.	
<b>Barrier(s)</b>	N/A	
<b>Objective(s)</b>	1. Convene Barrier Analysis Working Group to conduct Barrier Analysis Process	
	2. Develop Action Plan based on barrier analysis results	
	<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
	Lori Michalski, Chief Human Capital Officer Office of Administration	Yes
	Wayne A. Williams, Director Office of Departmental Equal Employment Opportunity (ODEEO)	Yes
	<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
	No	No
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Examination of the B14 table showed that the inclusion rate for PWD (8.01%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).  The inclusion rate for PWD (0.61%) also exceeded the inclusion rate for people with no disability in involuntary separations (0.28%).  The B14 also revealed that the inclusion rate for PWTD (8.06%) exceeded the inclusion rate for people with no disability in voluntary separations (7.92%).

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

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

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

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

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

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

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

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

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