



MD-715 – Part J, Fiscal Year 2021

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

Prepared By: Office of Departmental Equal Employment Opportunity (ODEEO)
U.S. Department of Housing and Urban Development

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 affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

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

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

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

Response: The representation rate for PWD in the GS-11 to SES grade level cluster was 11.85%, which is 0.15% below the 12.00% goal but it is an increase over the previous year representation.

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

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

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

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

Section II: Model Disability Program

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

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

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

Answer: Yes

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	15	Shirley Robinson Selective Placement Coordinator OCHCO shirley.v.robinson@hud.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Shirley Robinson Selective Placement Coordinator OCHCO
Processing reasonable accommodation requests from applicants and employees	7	0	6	Erica M. Jones, Reasonable Accommodation Branch Chief, OCHCO erica.m.jones@hud.gov
Processing Section 508 Compliance requests	1	1	50	Jeffrey Salit, Section 508 Coordinator, OCIO jeffrey.l.salit@hud.gov
Processing of Architectural Barriers Act complaints and insuring compliance	0	0	10	Rex J. Pace ABA Coordinator, OGC, Rex.j.pace@hud.gov

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

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

Answer: Yes

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

B. Plan to Ensure Sufficient Funding for The Disability Program

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

Answer: Yes

Response:

Section III: Plan to Recruit and Hire Individuals with Disabilities

A. Plan to Identify Job Applicants with Disabilities

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

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

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

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

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

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

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

Answer: Yes

Response: HUD provides ad-hoc training to all Program Office hiring managers and Administrative Officers on hiring authorities and practices to increase HUD's use of the Schedule A hiring authority and Veteran's recruitment programs. This training is provided virtually to include field managers and to accommodate the workplace during the pandemic.

B. Plan To Establish Contacts with Disability Employment Organizations

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

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

C. Progression Towards Goals (Recruitment and Hiring)

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

New Hires for Permanent Workforce (PWD) Answer: No

New Hires for Permanent Workforce (PWTD) Answer: No

Response: No triggers existed in FY 2021 for PWD and PWTD among the new hires in the permanent workforce. HUD exceeded the Federal government wide 12% goal for PWD (16.64%) and the 2% goal for PWTD at 4.48%.

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

New Hires for MCO (PWD) Answer: Data Unavailable

New Hires for MCO (PWTD) Answer: Data Unavailable

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

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

Qualified Applicants for MCO (PWD) Answer: Data Unavailable

Qualified Applicants for MCO (PWTD) Answer: Data Unavailable

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

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

Promotions for MCO (PWD)
 Promotions for MCO (PWTD)

Answer: Data Unavailable
 Answer: Data Unavailable

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

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

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

A. Advancement Program Plan

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

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

B. Career Development Opportunities

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

Response: During FY 2021, HUD offers the Franklin Covey Leadership Journey Program for GS 12-14 non-supervisors; President’s Management Council Interagency Rotation Program (PMC) for GS-13/14/15’s, which was offered virtually with two internal and two external participants; and the Rotation Assignment Program (RAP), which is open to all employees throughout HUD.

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	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	257	257	12.84%	12.84%	2.72%	2.72%

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 applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Applicants (PWD) Answer: No
- b. Selections (PWD) Answer: No

Response: N/A

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) in the text box.

- a. Applicants (PWTD) Answer: No
- b. Selections (PWTD) Answer: No

Response: N/A

C. Awards

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

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

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

Time off awards:

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

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

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

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

Cash Awards:

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

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

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

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

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

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

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

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

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

Response:

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

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

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

D. Promotions

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

- a. SES
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable
- b. Grade GS-15
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable
- c. Grade GS-14

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

d. Grade GS-13

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

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

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

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

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans,

please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- a. New Hires to SES (PWD) Answer: Data Unavailable
- b. New Hires to GS-15 (PWD) Answer: Data Unavailable
- c. New Hires to GS-14 (PWD) Answer: Data Unavailable
- d. New Hires to GS-13 (PWD) Answer: Data Unavailable

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

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD’s among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.
- a. New Hires to SES (PWTD) Answer: Data Unavailable
 - b. New Hires to GS-15 (PWTD) Answer: Data Unavailable
 - c. New Hires to GS-14 (PWTD) Answer: Data Unavailable
 - d. New Hires to GS-13 (PWTD) Answer: Data Unavailable

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

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.
- a. Executives
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable
 - b. Managers
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable
 - c. Supervisors
 - I. Qualified Internal Applicants (PWD) Answer: Data Unavailable
 - II. Internal Selections (PWD) Answer: Data Unavailable

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

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

a. Executives

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

IV. Internal Selections (PWTD) Answer: Data Unavailable

b. Managers

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

IV. Internal Selections (PWTD) Answer: Data Unavailable

c. Supervisors

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

IV. Internal Selections (PWTD) Answer: Data Unavailable

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

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

a. New Hires to Executives (PWD) Answer: Data Unavailable

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

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

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

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

a. New Hires to Executives (PWTD) Answer: Data Unavailable

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

- c. New Hires to Supervisors (PWTD) Answer: Data Unavailable
Response: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA Staffing applicant flow system at the end of 3rd Quarter of FY 2021.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Answer: Yes

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

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

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

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

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

Response: N/A

B. Accessibility of Technology and Facilities

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. §

794(b)), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151 – 4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

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

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

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

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

Response: N/A

C. Reasonable Accommodation Program

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

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

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

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

Response: HUD received final approval of its newer updated draft Reasonable Accommodation Handbook from the EEOC Upon finalization of negotiations with HUD unions, HUD will implement that Handbook.

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

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

Response: HUD updated its Reasonable Accommodation Program policy to include the implementation of EEOC's Personal Assistance Services (PAS) requirement. Requests for PAS follow the same process as outlined in HUD Handbook 7855.1, Procedures for Providing Reasonable Accommodation. The policy outlines the process for requesting PAS, determining whether such services are required, and the agency's right to deny such requests when provision of the services would pose an undue hardship. The updated draft Reasonable Accommodation Handbook completed HUD's internal clearance process, was submitted to the EEOC for review, and received EEOC concurrence. HUD has not yet received any requests for PAS but has a contractor in place to ensure that PAS will be made available when needed.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: Yes

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

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

Answer: No

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

Response: There were no findings of discrimination relative to this request during FY 2021.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: Yes

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

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

Answer: No

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

Response: There were no findings of discrimination relative to this request during FY 2021.

Section VII: Identification and Removal of Barriers

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

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

Answer: No

Response: To date, HUD has not identified any barriers that affect employment opportunities for PWD and/or PWTD.

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

Answer: No

Response: To date, HUD has not identified any barriers that affect employment opportunities for PWD and/or PWTD. However, in FY 2021, HUD began a review of data and created an initial plan to conduct barrier analysis for identified triggers. Upon the identification of barriers, HUD will create a plan to correct the barriers.

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

Trigger 1: PWD in Grade Cluster GS-11 to SES is below the federal benchmark of 12.00% at 11.85%.

Statement of Condition That Was a Trigger for a Potential Barrier

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

Barrier Analysis Process

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

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

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s): N/A

Description of Policy, Procedure, or Practice
N/A

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

Report of Accomplishments

Fiscal Year	Accomplishments