MD - 715 (PART J) SPECIAL PROGRAM PLAN FOR RECRUITING, HIRING, ADVANCEMENT & RETENTION OF PERSONS WITH A DISABILTIY

Fiscal Year 2022

Prepared by the Office of Departmental
Equal Employment Opportunity
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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 <u>PWD</u> 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: No

   Response: The representation rate for PWD in the GS-11 to SES grade level cluster was 12.74%, which is a 0.89% increase over the previous year of 11.85%.

2. Using the goal of 2.00% as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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 during 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	1	P. Victoria Williams, Director, Employee Health, and Wellness Division (EAP), Health and Wellness, OCHCO, P.Victoria.Williams@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

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(s) that disability program staff have received. If "no", describe the training(s) planned for the upcoming year.

       Answer: Yes

- **Response:** The Reasonable Accommodation Branch (RAB) has received training on; Barrier Analysis, MD 715, Disability Program Manager Training, Using and Presenting HR Data for Organizational Decisions, EEOC EXCEL Conference, RA Framework – Disability Accommodation Overview and Analysis, Telework as a Reasonable Accommodation, and Reasonable Accommodation – The Mistakes Agencies Make.

  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

Section III: Plan to Recruit and Hire Individuals with Disabilities

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: 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 2022 for PWD and PWTD among the new hires in the permanent workforce. HUD exceeded the Federal government wide 12% goal for PWD (18.16%) and the 2% goal for PWTD at 3.75%.

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 301 (PWD)   Answer: Yes
   New Hires for MCO 301 (PWTD)   Answer: No

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

   New Hires for MCO 360 (PWD)   Answer: No
   New Hires for MCO 360 (PWTD)   Answer: Yes

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

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

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 0301 (PWD)   Answer: Yes
Qualified Applicants for MCO 0301 (PWTD)   Answer: Yes

Response: The percentage of PWD (7.20%) who were internally qualified for MCO 0301 positions, was below the percentage of PWD (8.59%) who internally applied for MCO 0301 positions. The percentage of PWTD (4.00%) who were internally qualified for MCO 0301 positions was below percentage of PWTD (4.05%) who internally applied for MCO 0301 positions. HUD has developed a plan to address this data deficiency in Part H of this report.

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

Response: N/A

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

Response: N/A

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: The percentage of PWD (0.00%) who were internally selected for MCO 0301 positions, was below the percentage of PWD (7.20%) who internally qualified for MCO 0301 positions. The percentage of PWTD (0.00%) who were internally selected for MCO 0301 positions was below percentage of PWTD (4.00%) who internally qualified for MCO 0301 positions. HUD has developed a plan to address this data deficiency in Part H of this report.

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

Response: The percentage of PWD (0.00%) who were internally selected for MCO 0360 positions was below percentage of PWD (15.71%) who internally qualified for MCO 0360 positions. The percentage of PWD (0.00%) who were internally selected for MCO 0360 positions was below the percentage of PWTD (7.62%) who internally qualified for MCO 0360 positions. HUD has developed a plan to address this data deficiency in Part H of this report.

Promotions for MCO 1101 (PWD)   Answer: Yes
Promotions for MCO 1101 (PWTD)   Answer: Yes

Response: The percentage of PWD (0.00%) who were internally selected for MCO 1101 positions was below the percentage of PWD (10.24%) who internally qualified for MCO 1101 positions. The percentage of PWTD (0.00%) who were internally selected for MCO 1101 positions was below the percentage of PWTD (4.89%) who internally qualified for MCO 1101 positions. 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 2022, 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	4	4	0	0	N/A	N/A
Mentoring Programs	46	46	15	15	N/A	N/A
Coaching Programs	49	49	0	0	N/A	N/A
Training Programs	76	76	8	8	N/A	N/A
Detail Programs	39	39	8	8	N/A	N/A

Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

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 2022, PWD and PWTD received Time Off Awards at lower rates in every hour category compared to the benchmark of 12.54%. The inclusion rate for PWD (15.22%) receiving cash awards $500 and under, is below the benchmark of 16.43%. Additionally, the inclusion rates for PWD and PWTD receiving cash awards between $501 - 999 and $5000 or more, fell below the respective benchmarks.

Time off awards:

- The inclusion rates for PWD (9.92%) and PWTD (8.97%) receiving time off awards between **1 - 10 hours,** fell below the benchmark of 12.54%.

- The inclusion rates for PWD (7.94%) and PWTD (6.41%) receiving time off awards between **11 - 20 hours,** fell below the benchmark of 9.12%.
- The inclusion rates for PWD (7.37%) and PWTD (7.26 %) receiving time off awards between **21 - 31 hours,** fell below the benchmark of 7.93%.
- The inclusion rates for PWD (7.47%) and PWTD (7.26 %) receiving time off awards between **31 - 40 hours,** fell below the benchmark of 10.66%.

Cash Awards:

- The inclusion rate for PWD (15.22%) receiving cash awards $500 and Under, is below the benchmark of 16.43%.
- The inclusion rate for PWD (8.13%) and PWTD (7.69%) receiving cash awards $501 - 999, is below the benchmark of 11.15%.
- The inclusion rate for PWD (36.39%) and PWTD (31.62%) receiving cash awards $1000 - 1999, is below the benchmark of 41.75%.
- The inclusion rate for PWD (34.40%) and PWTD (40.60%) receiving cash awards $2000 - 2999, is below the benchmark of 49.18%.
- The inclusion rate for PWD (5.20%) and PWTD (5.13%) receiving cash awards $3000 - 3999, is below the PWD benchmark of 9.72%.
- The inclusion rates for PWD (0.09%) and PWTD (0.00%) receiving cash awards $4000 - 4999, are below the PWD and PWTD benchmark of 0.35%.
- The inclusion rates for PWD (0.00%) and PWTD (0.00%) receiving cash awards $5000 or more, are below the PWD and PWTD benchmark of 0.28.

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 (3.50%, 37) and PWTD (3.42%, 8), receiving Quality Step Increases, is below the benchmark of 4.38% (350).

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: Yes
      II. Internal Selections (PWD)   Answer: No

      Response: The percentage of PWD (0.00%) selected internally for SES positions was below the percentage of PWD (7.73) who were qualified for GS-15 positions.

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

      Response: The percentage of PWD (1.92%) selected internally for GS-15 positions was below the percentage of PWD (6.75%) who were internally qualified for GS-14 positions. The percentage of PWD (1.92%) who were selected internally for GS-15 positions was below the percentage of PWD (7.73%) who were internally qualified for GS-15 positions.

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

      Response: The percentage of PWD (4.25%) selected internally for GS-14 positions was below the percentage of PWD (5.86%) who were internally qualified for GS-13 positions. The percentage of PWD (4.25%) who were selected internally for GS-14 positions was below the percentage of PWD (6.75%) who were internally qualified for GS-14 positions.

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

      Response: The percentage of PWD (4.03%) who were selected internally for GS-13 positions was below the percentage of PWD (5.86%) who were internally qualified for GS-13 positions. The percentage of PWD (4.03%) selected internally

for GS-13 positions was below the percentage of PWD (10.46%) who were qualified for GS-12 positions. By the close of FY22, HUD obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

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

        Response: The percentage of PWTD (0.00%) selected internally for SES positions was below the percentage of PWTD (3.96%) who were internally qualified for GS-15 positions.

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

        Response: The percentage of PWTD (0.0%) selected internally for GS-15 positions was below the percentage of PWTD (3.15%) who were internally qualified for GS 14 positions. The percentage of PWTD (0.0%) selected internally for GS 15 positions was below the percentage of PWTD (3.96%) who were internally qualified for GS 15 positions.

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

        Response: The percentage of PWTD (1.54%) selected internally for GS-14 positions was below the percentage of PWTD (3.15%) who were internally qualified for GS-14 positions. The percentage of PWTD (1.54%) who were selected internally for GS-14 positions was below the percentage of PWTD (4.15%) who were internally qualified for GS-13 positions.

    d. Grade GS-13
        I.   Qualified Internal Applicants (PWTD)   Answer: Yes
        II. Internal Selections (PWTD)   Answer: Yes

Response: The percentage of PWTD (4.03%) who were selected internally for GS-13 positions was below the percentage of PWTD (4.15%) who were internally qualified for GS-13 positions. The percentage of PWTD (4.03%) selected internally for GS-13 positions was below the percentage of PWTD (4.87%) who were internally qualified for GS-12 positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

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: No
    b. New Hires to GS-15 (PWD)   Answer: Yes

        Response: The percentage of PWD (0.0%) selected externally for GS-15 positions was below the percentage of PWD (5.06%) who were externally qualified for GS-15 positions.

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

        Response: he percentage of PWD (0.00%) selected externally for GS-14 positions was below the percentage of PWD (5.06%) who were externally qualified for GS-14 positions.

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

        Response: The percentage of PWD (4.29%) selected externally for GS-13 positions was below the percentage of PWD (5.30%) who were externally qualified for GS-13 positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions. (The SES-SL-ST Applicant Flow Data withing USA Staffing was obtained within the first quarter of FY 2023)

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: No
    b. New Hires to GS-15 (PWTD)   Answer: Yes

Response: The percentage of PWTD (0.0%) selected externally for GS-15 positions was below the percentage of PWTD (2.61%) who were externally qualified for GS-15 positions.

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

Response: The percentage of PWD (0.0%) selected externally for GS-14 positions was below the percentage of PWTD (2.31%) who were externally qualified for GS-14 positions.

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

 Response: The percentage of PWTD (0.95%) selected externally for GS-13 positions was below the percentage of PWTD (2.16%) who were externally qualified for GS-13 positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

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: Yes
       II. Internal Selections (PWD)   Answer: Yes

    Response: The percentage of PWD (3.86%) selected internally for Executive positions was below the percentage of PWD (8.47%) who were qualified for Manager positions. The percentage of PWD (3.86%) who were selected internally for Executive positions was below the percentage of PWD (8.10%) who were qualified for Executive positions.

    b. Managers
        I.   Qualified Internal Applicants (PWD)   Answer: Yes
       II. Internal Selections (PWD)   Answer: Yes

    Response: The percentage of PWD (3.52%) selected internally for Manager positions was below the percentage of PWD (5.86%) who were qualified for GS-13 positions. The percentage of PWD (3.52%) who were selected internally for Manager positions was below the percentage of PWD (8.47%) who were qualified for Manager positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

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

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

        Response: The percentage of PWTD (1.29%) selected internally for Executive positions was below the percentage of PWTD (3.99%) who were qualified for Manager positions. The percentage of PWTD (1.29%) who were selected internally for Executive positions was below the percentage of PWTD (4.05%) who were qualified for Executive positions.

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

        Response: The percentage of PWTD (1.41%) selected internally for Manager positions was below the percentage of PWTD (4.15%) who were qualified for GS-13 positions. The percentage of PWTD (1.41%) who were selected internally for Manager positions was below the percentage of PWTD (3.99%) who were qualified for Manager positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

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

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: Yes

Response: The percentage of PWD (1.72%) selected externally for Executive positions was below the percentage of PWD (5.17%) who were externally qualified for Executive positions.

b. New Hires to Managers (PWD)   Answer: Yes

Response: The percentage of PWD (0.0%) selected externally for Manager positions was below the percentage of PWD (4.84%) who were externally qualified for Manager positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

c. New Hires to Supervisors (PWD)   Answer: N/A

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: Yes

Response: The percentage of PWTD (0.0%) selected externally for Executive positions was below the percentage of PWTD (2.33%) who were externally qualified for Executive positions.

b. New Hires to Managers (PWTD)   Answer: Yes

Response: The percentage of PWTD (0.0%) selected externally for Manager was below the percentage of PWTD (2.04%) who were externally qualified for Manager positions. By the close of FY22, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

c. New Hires to Supervisors (PWTD)   Answer: N/A

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: Yes

    Response: The inclusion rate for PWD involuntary separations (3.88%) exceeded the rate of persons with no disability of (2.33%) 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: No
    b. Involuntary Separations (PWTD)   Answer: No

    Response: No Trigger

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: https://www.hud.gov/accessibility

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: https://www.hud.gov/accessibility

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: HUD created a new accessibility statement on the HUD public website to ensure compliance with the EEOC and government standards.

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 accommodation during the reporting period. (Please do not include previously approved requests with repetitive accommodation, such as interpreting services.)

   Response: Approximately 13.6% of the 737 closed cases, in FY 2022, were closed timely (i.e., within 30 business days). HUD's average time frame for processing the 737 closed cases was approximately 124 business days. In FY 2022, specifically the time period beginning March 2022, the Reasonable Accommodation Branch (RAB) received an extremely high number of RA requests due to return-to-work communications to the workforce: HUD received 586 RA requests. Of those 586 RA requests, 530 RA requests were for remote work/full-time telework.

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: The Reasonable Accommodation Branch provided three Reasonable Accommodations training sessions delivered to supervisors, including 2 "Deep Dive" sessions. These trainings increased awareness of HUD's reasonable accommodation program and resources for new employers and supervisors-particularly timely given the novel pandemic's impact on the federal workforce. Additionally, the Employee Health and Wellness Division provides RA and EAP training during Open Hours Sessions. Two Reasonable Accommodations and EAP training sessions were provided to 922 supervisors

and managers. These sessions provided guidance and information to assist supervisors and managers prepare for employee return/reentry to HUD buildings. The Reasonable Accommodation Branch resolved EEOC Feedback Items. Fourteen reasonable accommodation policy issues were corrected, and an updated RA policy was provided to EEOC. The updated policy was approved by EEOC and updated on HUDs internal and external websites.

Of 205 completed reasonable accommodation satisfaction surveys, 193 or 94% of employees or supervisors reported believing the reasonable accommodation provided enabled the employee to perform the essential functions of the job.

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 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 2022 was 54. Of the 54 formal EEO complaints, 12 complaints were filed by PWD alleging harassment (22.22%), which slightly exceeded the government wide average by 0.12%. Nevertheless, this is a 1.36% decrease from the number filed in FY 2021 (23.58%).

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 2022.

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 reasonable accommodation, as compared to the government-wide average?

   Answer: Yes

   Response: Of the 54 formal EEO complaints filed in FY 2022, 10 alleged a failure to provide reasonable accommodation (18.52%), 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: Yes

   Response: In FY 2022, HUD had two complaints alleging Failure to provide a Reasonable accommodation that resulted in a settlement. No complaints with this issue resulting in a finding.

3. If the agency has 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 2022.

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 2022, 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	Yes	• FY 2022 GS-11 to SES participation rate of 12.74%. • 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	

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s): N/A

Description of Policy, Procedure, or Practice
Nothing to report at this time. Barrier analysis is still in progress.

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	11/07/2022	
Develop Action Plan based on barrier analysis results.	11/30/2022	09/30/2023	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.	11/07/2022	
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.	09/30/2023	
09/30/2023	Interview with Special Recruitment Coordinator to develop a plan to increase participation of hiring PWD and PWTD.		

Report of Accomplishments

Fiscal Year	Accomplishments
2022	Scheduled barrier analysis meeting to discuss objectives and strategies to investigate the potential barrier.
2022	Convened Barrier Analysis Working Group to begin the Barrier Analysis Process

Trigger 2: **Low participation rates in the MCOs, with emphasis on 0301 CPD Representative (below the benchmark of 3.49% at 2.13%) and 0360 EEO Specialist (below the benchmark of 2.55% at 0.00%).**

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	**B7P**	In FY 2022, the percentage of New Hires who are PWD in the MCO 301 job cluster, is below the benchmark of 3.49% at 2.13%. In addition, the percentage of New Hires who are PWTD in the MCO 360 job cluster, is below the benchmark of 2.55% at 0.00%.

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	• FY 2022, The percentage of PWD (2.13%) selected externally for MCO 0301 positions was below the percentage of PWD (3.49%) who were externally qualified for MCO 0301 positions. • Also, in FY 2022, the percentage of PWTD (0.00%) selected externally for MCO 0360 positions was below the percentage of PWTD (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	

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

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s): N/A

Description of Policy, Procedure, or Practice
Nothing to report at this time. Barrier analysis will begin in 2023.

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	04/01/2023	09/30/2023	Yes		
Develop Action Plan based on barrier analysis results.	07/31/2023	09/30/2023	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)
09/30/2023	Identify specific objectives, strategies, and action steps to complete barrier analysis.		
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.		

Report of Accomplishments