



Fiscal Year 2022

Prepared by The Office of Departmental
Equal Employment Opportunity
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PART A: Department or Agency Identifying Information

Agency	2 nd level reporting component	Address City, State Zip Code	CPDF Code (xxxx)	FIPS Code
HUD		451 7 th Street, SW Washington, DC 20410	HU83	11001

PART B: Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Non-Appropriated Workforce	Total Workforce
Number of Employees	7,991	245	N/A	8,236

PART C: Agency Official(s) Responsible for Oversight of EEO Program(s)

Agency Leadership	Name	Title
Head of Agency Official	Marcia L. Fudge	Secretary, U.S. Department of Housing and Urban Development
Principal EEO Director/ Official Title/ Series/Grade	Wayne A. Williams Wayne.A.Williams@hud.gov	Director, Office of Departmental Equal Employment Opportunity (ODEEO), ES-0260-00
Title VII Affirmative EEO Program Official	Tonya P. Watson Tonya.P.Watson@hud.gov	Director, Affirmative Employment Division, ODEEO, GS-0260-15
Section 501 Affirmative Action Program Official	P. Victoria Williams P.Victoria.Williams@hud.gov	Director, EAP, Health and Wellness Division, Office of the Chief Human Capital Officer, Office of the Assistant Secretary for Administration, GS-0201-15
Complaint Processing Program Manager	Rodney M. Cox Rodney.M.Cox@hud.gov	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15
ADR Program Manager	Rodney M. Cox Rodney.M.Cox@hud.gov	Director, Equal Employment Opportunity Division, ODEEO, GS-0260-15
Principle MD-715 Preparer	Patrice W. Dogbatse Patrice.W.Dogbatse@hud.gov	Equal Employment Opportunity Specialist, Federal Women's Program Manager, (Interim) Hispanic Employment Program Manager, Affirmative Employment Division, ODEEO, GS-0260-13

Agency Leadership	Name	Title
Other Responsible EEO Staff	Willie D. Tucker Willie.D.Tucker@hud.gov	Equal Employment Opportunity Specialist, Disability Employment Program Manager, Affirmative Employment Division, ODEEO, GS-0260-13
Other Responsible EEO Staff	Lutheria N. Peters Lutheria.N.Peters@hud.gov	Data Scientist, Affirmative Employment Division, ODEEO, GS-1560-14

PART D1: List of Subordinate Components

Subordinate Component	City	State	CPDF Code (xxxx)	FIPS Code
None				

PART D2: Supplemental Documentation

Have the following mandatory documents been uploaded?	Please respond "Yes" or "No"	Comments
Agency's Strategic Plan 2018-2022	Yes	
Alternative Dispute Resolution Procedures	Yes	
Anti-Harassment Policy and Procedures	Yes	
EEO Policy Statement	Yes	
Organizational Chart	Yes	
Personal Assistance Services Procedures	Yes	Included in the Reasonable Accommodation Procedures.
Reasonable Accommodation Procedures	Yes	

PART E: EXECUTIVE SUMMARY

E.1 - Mission/Vision

The U.S. Department of Housing and Urban Development (HUD or Department) is a cabinet-level Department that employed 8,236 employees in its Headquarters (HQ), regional, and field offices throughout HUD's 10 regions. HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes. HUD's vision is to continually seek to improve the delivery of its programs and remain true to its mission to expand opportunities for those it is charged to serve.

HUD will continue to pursue two overarching priorities: increasing equity and improving customer experience across all HUD programs. The agency's strategic goals are:

- Strategic Goal 1: Support Underserved Communities
- Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing
- Strategic Goal 3: Promote Homeownership
- Strategic Goal 4: Advance Sustainable Communities
- Strategic Goal 5: Strengthen HUD's Internal Capacity

These goals present the core vision of what HUD hopes to accomplish, the strategies to accomplish those objectives, and the indicators of success. Through these efforts, HUD will give the American people and their communities the opportunity to thrive.

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

This report highlights HUD's accomplishments, during fiscal year (FY) 2022, in establishing and maintaining a model Equal Employment Opportunity (EEO) program based on the six Essential Elements outlined by the U.S. Equal Employment Opportunity Commission (EEOC). Those six Essential Elements are:

- A. Demonstrated Commitment from Agency Leadership
- B. Integration of EEO into the Agency's Strategic Plan
- C. Management and Program Accountability
- D. Proactive Prevention of Unlawful Discrimination
- E. Efficiency
- F. Responsiveness and Legal Compliance

HUD reviewed its program activities against the six Essential Elements and where program deficiencies were identified, HUD developed activities to attain compliance. The sections below highlight HUD's major activities and challenges regarding each of the Essential Elements. Additional information can be found in Part G of this report, the Department's Self-Assessment

Checklist, which consists of a list of Yes/No (Met/Unmet) questions grouped under each Essential Element.

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

- The FY 2022 EEO and Alternative Dispute Resolution policy statements were issued by Secretary Marcia Fudge on June 10, 2022 and made available to all employees and applicants on HUD’s website (www.HUD.gov).
- The “EEO/DEIA Coin of Excellence” award was utilized as an honorary award to recognize employees who uphold the Department's value of and commitment to the areas of EEO, Affirmative Employment, and Diversity, Equity, Inclusion, and Accessibility (DEIA). The award: (1) emphasizes the Federal Government’s policy of providing EEO to all Federally employed citizens; (2) demonstrates that management values employees, supervisors, and managers who actively and effectively contribute to EEO and DEIA implementation and growth within the organization; and (3) encourages organization-wide commitment to the EEO and DEIA programs through publicizing the impact and positive effects of these contributions. A ceremony was held on September 29, 2022, and twenty-five recipients were awarded coins during the inaugural ceremony.
- HUD distributed the inaugural issue of the ODEEO Insider, an EEO newsletter for all employees, providing up-to-date information in all areas of EEO and DEIA.
- HUD implemented an Anti-Harassment Program and procedures for employees. Training was provided to all HUD supervisors and managers and the training is now available on HUD Virtual University for all employees.

Essential Element B: Integration of EEO into the Agency’s Strategic Plan – *Requires the Agency's EEO program to be organized and structured to maintain a workplace that is free from discrimination in its management policies, practices, or procedures and supports the Agency's mission, as reflected in the strategic plan.*

- The Office of Departmental Equal Employment Opportunity (ODEEO) and the Office of Diversity, Equity, Inclusion, and Accessibility (DEIA) collaboratively meet each quarter with the Department’s senior leaders from each program office and HUD regions to discuss workforce demographics; potential barriers to a model EEO program; recommended planned activities to address identified triggers; and current EEO complaint activities.

- The Agency staffs the Anti-Harassment Program (AHP) with a program Director and two AHP investigators/subject matter experts. The Agency appropriates funds to add two additional investigators to the team along with an administrative support team member. The AHP policy and program were disseminated to the entire workforce on July 21, 2022.
- AHP published procedures and tools for supervisory and non-supervisory staff. The procedures were added to HUD's internal website and made available on the agency policy page, making the AHP policy and procedures tools accessible 24/7. A dissemination of the AHP policy will occur at least once a year.

Essential Element C: Management and Program Accountability – *Requires the Agency Head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the Agency's EEO Program and Plan.*

- The EEO Director provided the State of the Agency briefing to the Deputy Secretary and other senior management officials regarding the effectiveness of the organization's EEO programs, policies, and practices. The briefing provided the opportunity for interactive discussions and action plan development to correct deficiencies and address identified triggers of potential barriers to equal employment opportunity.
- ODEEO in conjunction with the Office of General Counsel and Office of the Chief Human Capital Officer sponsored training to 207 supervisors on: the EEO complaint process; supervisor responsibilities with respect to providing non-discriminatory work environments; EEOC regulations; prevention of employment discrimination; and strategies to build and sustain healthy work environments.
- HUD's EEO Training Program course registration was announced to all HUD employees, offering eight supervisory and non-supervisory courses through HUD Virtual University. The agency required all supervisors and managers to take: Civility in the Workplace, Basics of EEO, Reasonable Accommodations, and many other supervisory courses in preparation for re-entering the workplace.
- Due to COVID-19 restrictions, Field Quality Management Reviews were postponed. HUD will reestablish reviews in FY 2023 to regularly assess the regional and field office EEO programs, introduce the EEO Learning Path (an on-going training model), and provide recommendation for recruitment strategies to increase low participation of Hispanics and Persons with Disabilities/Targeted Disabilities.

Essential Element D: Proactive Prevention of Unlawful Discrimination – *Requires the Agency to conduct a self-assessment on at least an annual basis. The self-assessment must identify areas where barriers may operate to exclude certain groups, and strategic plans must be developed to eliminate identified barriers.*

- EEOC facilitated HUD’s refresher Barrier Analysis training provided to key internal stakeholders and contributors to the MD 715 report.
- Program office leadership received an introduction to HUD’s newly developed EEO Barrier Analysis Assessment tool designed to conduct quarterly investigation into policies, procedures and practices that can potentially be barriers to equal employment opportunities.
- Two Trigger Strategy Briefings separately addressed low participation for Hispanics and hiring of people with disabilities and people with targeted disabilities (PWD/PWTD). Program offices joined ODEEO, HUD Recruitment and Staffing Division, and subject matter experts for a briefing on hiring authorities, recruitment resources and strategies, and sharing best practices for retaining employees.
- HUD strongly encourages participation in the Office of Personnel Management Federal Employee Viewpoint Survey (FEVS). HUD’s overall Employee Engagement remains high at 76% positive and 5 points greater than the government average of 71%. Global satisfaction measures employees’ contentment with their job, their pay, their organization, and if they would recommend their organization as a good place to work. HUD’s Global Satisfaction also remains high at 70% and 8 points greater than the government average of 62%. In a new measure added this year, 74% of HUD’s employees reported positive perceptions of agency practices related to Diversity, Equity, Inclusion and Accessibility (DEIA), which was 5 points higher than the government average of 69%.

Essential Element E: Efficiency – *Requires that the Agency Head ensure that there are effective systems in place for evaluating the impact and effectiveness of the Agency’s EEO Programs as well as an efficient and fair dispute resolution process.*

- The agency maintains an efficient, fair, and impartial complaint resolution process and has established and encourages the widespread use of a fair alternative dispute resolution (ADR) program.
- HUD requires managers and supervisors, as opposed to individuals delegated with settlement authority, to participate in Alternative Dispute Resolution (ADR) to effectively resolve workplace disputes in an expeditious, cost effective, and mutually agreeable manner. ODEEO increased its marketing efforts to promote the benefits of ADR and revised the ADR information to an accessible format and is posted on HUD’s website.

- ODEEO continues to work with contract EEO investigators to review EEO investigation processing to improve efficiency and thoroughness.

Essential Element F: Responsiveness and Legal Compliance – *Requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.*

- HUD timely posted the quarterly No FEAR Act data to its public website.
- HUD procured the return of the iComplaints tracking system and prepared for the migration of complaints to Tyler Tech Entellitrak System (formerly iComplaints).

E. 3 – Executive Summary: Workforce Analysis

In FY 2022, HUD’s total workforce consisted of 8,236 employees: 7,991 permanent and 245 temporary employees. The number of permanent employees increased by 241 from 7,750, in FY 2021. The permanent workforce consisted of 3,316 (41.50%) male and 4,675 (58.50%) female. The total permanent female participation rate (58.50%) is significantly higher than the Civilian Labor Force¹ (CLF) benchmark (48.21%).

Participation rates for Hispanic males 308 (3.85%) and Hispanic females 397 (4.97%); White males 1,808 (22.63%) and White females 1,766 (22.10%); Native Hawaiian/Pacific Islander males (0.05%); and Two or More Races males 26 (0.33%) and Two or More Races females 39 (0.49%), were all below their corresponding CLF rates. However, participating above their corresponding CLF rates were Black males 894 (11.19%) and Black females 2,105 (26.34%); Asian males 238 (2.98%) and Asian females 303 (3.79%); Native Hawaiian/Pacific Islander females 9 (0.11%); American Indian/Alaska Native males 38 (0.48%) and American Indian/Alaska Native females 56 (0.70%).

The participation rate of Persons with Disabilities (PWD) in the permanent workforce increased by 0.08% from 964 (12.44%) to 1,058 (13.24%) in FY 2022. The participation rate of Persons with Targeted Disabilities (PWTD) in the permanent workforce increased by 0.08% from 221 (2.85%) in FY 2021, to 234 (2.93%) in FY 2022, which exceeds the EEOC federal benchmark of 2.0% for PWTD.

FY 2021, the GS-11 to SES grade cluster participation rate for PWD was 11.85% and was identified in Part J as a trigger for a potential barrier to equal employment opportunity.

¹ Civilian labor force is the percent of people over age 16 working or actively looking for work (according to the Bureau of Labor Statistics).

However, in FY 2022, the GS-11 to SES grade cluster participation rate increased to 12.74%, exceeding the hiring PWD benchmark of 12%, eliminating the potential barrier.

New Hires (*Permanent workforce*)

During FY 2022, HUD hired 826 permanent employees, an increase of 111 new hires from 715 in FY 2021. Of the 826 new employees, 150 (18.16%) were PWD and 31 (3.75%) were PWTD, both percentages are well above the EEOC federal benchmark hiring goals. While Black females represented the majority (23.85%) of the new permanent employees hired, Native Hawaiian/Pacific Islander males and females represented the lowest participation rate (0.05% and 0.11% respectively) of the new permanent employees hired.

Employee Separations (*Permanent workforce*)

In FY 2022, there were 681 permanent employees who separated from HUD (463 voluntarily and 218 involuntarily/other). Black or African American females represented the largest group (209) to separate (140 voluntarily and 69 involuntarily/other), followed by White males (162) as the next largest group to separate (114 voluntary and 48 involuntary/other). In addition, 105 PWD separated, of which 64 were voluntary and 41 involuntary/other. Lastly, 20 PWTD separated, of which 12 were voluntary and 8 were involuntary.

E. 4 – Executive Summary: Accomplishments

HUD staffed the agency Anti-Harassment Program (AHP) with a Director and two AHP investigators/SME and appropriated funds to add two additional investigators and an administrative support team member to the staff. The HUD AHP policy and program were disseminated to the entire workforce and supervisors/managers were provided training on July 21 and September 19, 2022.

Part G Accomplishments

In the first quarter of FY 2022, the Office of Chief Human Capital Officer, Office of Talent Development and Workforce Planning developed a schedule of training workshops for executives and political appointees, in preparation for returning to the workplace. (*Part G B.5.a.4*)

Training included:

- ODEEO launched the **HUD EEO Training Program** and conducted 33 EEO-focused training sessions to supervisory and non-supervisory employees in FY 2022, to include: Alternative Dispute Resolution Process (ADR), Basics of EEO, Civility in the Workplace, EEO Essentials, Workplace Etiquette, MBTI: Understanding Personality Types, and

Microaggressions: Little Things Have a Big Impact. By the end of the fiscal year, a total of 2,522 employees had received training.

- **EEO Essentials for Supervisors and Managers** – provided an overview of core statutory training, which includes the Managers’ Role in Building a Model EEO Program, The EEO Complaint Process, Common Bases for Complaints: What To Do When The Complaint Is Against You, Workplace Etiquette, and Alternative Dispute Resolution.
- **Civility Training for Leaders** - provided leaders with an overview of the skills and insights they need to achieve positive business results and engage employees in ways that inspire their best work.
- **The EEO Administrative Process and the Anti-Harassment Program** - provided an overview of the EEO process, guidance on how to avoid being named in an EEO complaint, how workplace harassment can constitute a hostile work environment, actionable solutions to prevent a hostile work environment, and the leader’s role in the agency’s Anti-Harassment Program.
- In addition, HUD provided 65 supervisory and non-supervisory rotational assignments, offered an agency-wide expo, 25 new employee orientations were provided to over 700 new employees, 36 training sessions delivered to 1,782 employees on topics such as: Individual Development Plan (IDP); Crucial Accountability; Power of Habit; Getting Things Done (GTD); and Alternative Dispute Resolution (ADR). Developed Consulting services to provide training analysis to requesting program and field offices.

Part H and Part I Accomplishments

Statement of Model Program Essential Element Deficiency - H1 Closed. In accordance with EEOC MD-715, Federal agencies must have in place an effective anti-harassment program to address sexual and non-sexual harassment and establish a separate independent investigatory process and procedure. The initial date of September 30, 2010 was the date set to eliminate the deficiencies that the agency had not disseminated the Anti-Harassment policy and procedures to all employees (A.2.a.1); the agency had not informed its employees about the Anti-Harassment Program (A.2.c.4); and, all managers and supervisors had not received orientation, training, and advice on their responsibilities under the Anti-Harassment policy (B.5.a.3).

The deficiencies were eliminated on July 21, 2022, when the AHP policy and program were disseminated to the entire workforce. The Agency has staffed the AHP with a program Director and two AHP investigators/SME. The Agency has also appropriated funds to add two additional investigators to the team along with an administrative support team member. Supervisors/managers were provided training access on July 21, 2022, and another training session on September 19, 2022.

Statement of Model Program Essential Element Deficiency – H2 states that the agency has not completed all investigations within the applicable prescribed time frame. (Part G – E.1.f.) The objective, “Establish an effective EEO complaint processing program that timely completes

EEO investigations within 180 days and FADs within 60 days of the request,” was initiated September 30, 2017; the modified target date for completion is April 30, 2023.

FY 2022 accomplishments are: Currently, there is staff serving in ODEEO with the sufficient professional background to review FADs, settlement agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents. HUD filled the critical vacancies of the Equal Employment Opportunity Division Team Lead and two Equal Employment Specialists. HUD procured iComplaints (EEO complaint tracking system) to effectively monitor and manage complaint activity. In addition, HUD increased marketing and awareness of the ADR program to increase participation for early EEO complaint and employee dispute resolution.

Statement of Model Program Essential Element Deficiency – H3 Closed. Low resolution rate in ADR process. *(Based on EEOC’s Technical Feedback Letter dated September 2, 2020)* (E.3.a-f) The objective, to increase participation in the ADR program, was initiated on September 30, 2017, with September 30, 2022, as the Modified date to eliminate the deficiency.

In FY 2022, accomplishments toward achieving the objective included a 150% increase in ADR participation, providing ADR training to approximately 1,120 supervisory and non-supervisory employees, and scripting and creating a marketing video to promote ADR.

Statement of Model Program Essential Element Deficiency – H4 Closed. The agency did not have a system in place to accurately collect, monitor, and analyze the following data: EEO Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official until September 2021, when the agency successfully acquired this system. (E.4.a.1)

The objective, “Establish a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system,” was initiated June 4, 2019, and HUD successfully migrated historical data to iComplaints EEO complaints tracking system, completing the objective, on April 14, 2022.

Statement of Model Program Essential Element Deficiency – H5. CLOSED. HUD does not collect the required applicant flow data necessary to determine what part of the recruitment and selection process requires further evaluation. (C.4.c)

The objective to establish a plan to collect applicant flow data was initiated on September 2, 2020 and completed by the close of FY 2022; obtaining access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.

Statement of Condition That Was a Trigger for a Potential Barrier - II. Low participation rate of Hispanic-Latino Males (3.85% vs. 6.82% CLF) and Females (4.97% vs. 6.16%) in the permanent workforce when compared to the Civilian Labor Force (CLF).

Accomplishments include ODEEO hosted 2nd EEOC Barrier Analysis training for HUD Barrier Analysis Team members and the objective to convene a Barrier Analysis Team and HR Partners to conduct Barrier Analysis was initiated on October 1, 2022, and accomplished by November 4, 2022. At the end of FY 2022, the HUD Barrier Analysis Team initiated biweekly meetings and has broken the analysis process into five areas to research: policies, procedures, and practices for recruitment, hiring, promotions, retention, and training.

E. 5 – Executive Summary: Planned Activities

Statement of Model Program Essential Element Deficiency – H2: The agency has not completed all investigations within the applicable prescribed time frame. (E.1.f.)

Target date to revise complaint process to decrease processing times is September 30, 2023. Quarterly meetings will be held with contract investigators to identify and address processing deficiencies.

Statement of Model Program Essential Element Deficiency – H3: Low resolution rate in ADR process. (E.3.a-f)

HUD identified two major challenges that may impact the ADR settlement rate: significant delays in the internal concurrence process for settlement agreements and parties potentially not participating in good faith. By September 30, 2023, HUD will review and implement additional initiatives to enhance marketing and ADR participation.

Statement of Condition That Was a Trigger for a Potential Barrier - I1: Low participation rate of Hispanic-Latino Males (3.85% vs. 6.82% CLF) and Females (4.97% vs. 6.16%) in the permanent workforce when compared to the Civilian Labor Force (CLF).

The objective to conduct a Barrier Analysis of the trigger target date for completion is September 30, 2023. The initial target date for completion was November 1, 2022, to develop draft recommendations/action plan to incorporate into the Agency's Hispanic Employment Plan with recruitment and hiring timelines and strategic goal and accomplishments that will reflect the increase of the participation of Hispanic employment. The modified target date for completion is September 30, 2023.

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

EEOC FORM 715-01 PART F	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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**CERTIFICATION OF ESTABLISHMENT OF CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Wayne A. Williams, Director
Office of Departmental Equal Employment Opportunity, ES-0260-00 am the
U.S. Department of Housing and Urban Development (HUD)
Principal EEO Director/Official

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.


The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

 Wayne A. Williams, Director Office of Departmental Equal Employment Opportunity U.S. Department of Housing and Urban Development (HUD)	March 17, 2023
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*Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.*

Date

 Marcia L. Fudge, Secretary U.S. Department of Housing and Urban Development (HUD)	March 17, 2023
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Signature of Agency Head or Agency Head Designee

Date

PART G: Agency Self-Assessment Checklist

ESSENTIAL ELEMENT A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP <i>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</i>				
Compliance Indicator		A.1 - The agency issues an effective, up to date EEO policy statement.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comment column. [see MD-715 II(A)]	Yes		FY 2022 EEO and ADR policy statements were issued by the Agency Head on June 10, 2022 and made available to all employees and applicants on HUD's website (www.HUD.gov).
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.	Yes		The EEO policy statement also includes the bases of gender expression, marital status, parental status, and veteran status.

Compliance Indicator		A.2 - The agency has communicated EEO policies and procedures to all employees.		
Measures	Measure has been met?	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.		
		Yes	No	
A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy?	Yes		
A.2.a.2	Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]	Yes		
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?			
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]	Yes		
A.2.b.3	Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comment column.	Yes		Procedures For Providing Reasonable Accommodation (7855.1) HUD.gov / U.S. Department of Housing and Urban Development (HUD)

A.2.c	Does the agency inform its employees about the following topics?			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often and the means by which such training is delivered.	Yes		HUD informs its employees about the EEO process during bi-weekly new employee orientation/onboarding and when an informal complaint is filed. The EEO complaint process is also posted on HUD’s webpage.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes		HUD informs its employees about the EEO process during bi-weekly new employee orientation/onboarding and when an informal complaint is filed. The ADR process is also posted on HUD’s webpage.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes		Reasonable Accommodation briefings were provided every two-weeks to new employees during New Employee Orientation/Onboarding and four supervisory employee training sessions were provided in FY 2022.
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes		On July 21, 2022, the new Anti-Harassment Program was announced to the entire workforce and will be announced annually going forward.
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If “yes”, please provide how often.	Yes		The agency annually (January/February) informs employees about behaviors that could result in disciplinary action.

Compliance Indicator		A.3 - The agency assesses and ensures EEO principles are part of its culture.		
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If “yes”, provide one or two examples in the comments section.	Yes		<p>On July 27, 2022, HUD provided recognition for demonstrated EEO excellence by awarding four employees the EEO and Equity Advancement Award during the 2022 Secretary's Award Program.</p> <p>On September 7, 2022, the Office of Departmental Equal Employment Opportunity (ODEEO), in partnership with the Office of Diversity, Equity, Inclusion, and Accessibility (DEIA) presented the EEO/ DEIA Coin of Excellence Award to 25 employees. This is an honorary award to recognize employees who uphold the Department's value of and commitment to the areas of EEO, Affirmative Employment, and Diversity, Equity, Inclusion, and Accessibility.</p>
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		
<p>ESSENTIAL ELEMENT B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION - <i>This element requires that the agency's policies, procedures, or practices and support the agency's strategic mission.</i></p>				
Compliance Indicator		B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.		

Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		The EEO Director reports directly to the Agency Head through the Secretary’s Designee, the Deputy Secretary, as guided by 5 U.S. Code § 302 - Delegation of authority.
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	N/A		
B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		The organizational chart reflects the reporting structure of the Deputy Secretary having the delegation of authority, based on 5 CFC §302, for the EEO office.
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		

B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comment column.	Yes		The State of the Agency was presented to the Deputy Secretary on July 14, 2022; the Chief Operating Officer on August 23 rd ; and the General Deputy Assistant Secretaries on September 7 th .
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes		
Compliance Indicator		B.2 - The EEO Director controls all aspects of the EEO program.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with	Yes		

	this authority in the comment column.			
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	Yes		
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		

B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]			N/A
Compliance Indicator		B.3 - The EEO Director and other EEO professional staff are involved in and consulted on management/personnel actions.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes		
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comment column.	Yes		<p>HUD Strategic Goals:</p> <p>Goal 3: Proactively prevent discrimination on the bases of race, color, national origin, religion, sex, age, reprisal, and disability. Eliminate barriers that impede free and open competition in the workplace.</p> <p>Goal 4: Integrate principles of diversity, equity, inclusion, and accessibility (DEIA) into all HUD programs, policies, and practices.</p>

Compliance Indicator	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes		
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes		
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes		
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not,	Yes		

	please identify the type(s) of training with insufficient funding in the comment column.			
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes		
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.	Yes		
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; and (u); 5 CFR § 315.709]	Yes		

B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(ii)]	Yes		
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	Yes		
B.4.e	Does the agency ensure that all new counselors and investigators, including contractors and collateral	Yes		

	duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?			
Compliance Indicator	B.5 - The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.5.a	Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO complaint process? [see MD-715(II)(B)]	Yes		
B.5.a.2	Reasonable Accommodation Procedures? [see 29 CFR § 1614.203(d)(3)]	Yes		
B.5.a.3	Anti-harassment policy? [see MD-715(II)(B)]	Yes		
B.5.a.4	Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of	Yes		

	disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]			
Compliance Indicator		B.6 - The agency involves managers in the implementation of its EEO program.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes		
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]	Yes		

ESSENTIAL ELEMENT C: MANAGEMENT AND PROGRAM ACCOUNTABILITY - *This element requires the agency head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the agency's EEO program and plan.*

Compliance Indicator		C.1 - The agency conducts regular internal audits of its component and field offices.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	Yes		Quarterly EEO Activity briefings are conducted with every program (component) and regional office.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.	Yes		Quarterly EEO Activity briefings are conducted with every program (component) and regional office.
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes		

Compliance Indicator		C.2 - The agency has established procedures to prevent all forms of EEO discrimination.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes		

C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	Yes		EEOD communicates and partners with the anti-harassment program to address those complaints and other issues of harassment. The agency ensures any employee filing a complaint alleging harassment is informed of their right to file a complaint with the anti-harassment program.
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept. of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept. of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comment’s column.	Yes		

C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]	Yes		
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]	Yes		
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	Yes		
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes		
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	Yes		
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business	Yes		

	days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]			
C.2.b.5	Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comment column.		No	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.
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]	Yes		
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the	Yes		PAS requests follow the same procedures as other reasonable accommodation requests. Procedures For Providing Reasonable Accommodation (7855.1) HUD.gov / U.S. Department of Housing and Urban Development (HUD)

	internet address in the comment column.			
Compliance Indicator	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes		
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes		
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		

C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes		
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes		
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity? [see MD-715, II(C)]	Yes		
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct? [see Enforcement Guidance, V.C.2]	Yes		
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		

C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes		
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes		
Compliance Indicator	C.4 - The agency ensures effective coordination between its EEO program and Human Resources (HR) program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes		
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program,	Yes		

	employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]			
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes		
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		

C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		
Compliance Indicator	C.5 - Following a finding of discrimination, the agency explores whether it should take a disciplinary action.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	Yes		
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes		The agency does discipline and/or sanction managers and employees for discriminatory conduct. However, there were no individuals sanctioned by order of the EEOC during this reporting period.

C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post-mortem to discuss lessons learned)? [see MD-715, II(C)]	Yes		
Compliance Indicator		C.6 - The EEO office advises managers/supervisors on EEO matters.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes		HUD provides quarterly EEO Activity briefings to management/supervisory officials to discuss current EEO complaint activities, workforce demographics, potential triggers, and recommendations to resolve identified barriers to equal employment.
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		

ESSENTIAL ELEMENT D: PROACTIVE PREVENTION - *This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.*

Compliance Indicator		D.1 - The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes		
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]	Yes		

Compliance Indicator		D.2 - The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes		
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes		
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs,	Yes		HUD regularly reviews complaint/grievance data, exit surveys, employee climate surveys, focus group discussions, and information from affinity groups and special emphasis programs.

	and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If “yes”, please identify the data sources in the comments column.			
Compliance Indicator		D.3 - The agency establishes appropriate action plans to remove identified barriers.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.3.a	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes		
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes		
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		

Compliance Indicator		D.4 - The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	Yes		HUD Affirmative Action Plan for People with Disabilities
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]	Yes		
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	Yes		
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]	Yes		

ESSENTIAL ELEMENT E: EFFICIENCY - *This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.*

Compliance Indicator		E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	Yes		The average processing time for an Acceptance/Dismissal was 53.07 calendar days.

E.1.e	Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		No	See Part H2
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		
E.1.h	When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes		
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes		
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the	Yes		HUD meets with the contractor quarterly and if needed, daily to resolve identified

	agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comment column.			deficiencies that occur during the processing of EEO complaints.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		
E.1.1	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		
Compliance Indicator		E.2 - The agency has a neutral EEO process.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If “yes”, please explain.	Yes		HUD has established a firewall between the complaint processing functions of the department's EEO program and the defensive function for the agency, the Office of General Counsel (OGC). OGC and ODEEO are separate entities under separate leadership with distinct and specific missions and objectives. Currently, there is staff serving in ODEEO with the sufficient professional background to review FADs, settlement

				<p>agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents. Consultation with OGC occurs on an as needed basis and ensures the attorney reviewing the matter does not serve in a defense function for the Department.</p>
E.2.b	<p>When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comment column.</p>	Yes		<p>The EEO office has access to Westlaw, EEOC Regulations, and EEO professionals that have served as subject matter experts over an extended period. HUD’s EEO Office contacts OGC senior leadership, who requests a field office attorney, not acting in a defensive role, to conduct the required legal sufficiency review.</p>
E.2.c	<p>If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]</p>	Yes		
E.2.d	<p>Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]</p>	Yes		
E.2.e	<p>If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC</p>	Yes		

	Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]			
Compliance Indicator		E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		
E.3.c	Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	Yes		
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		

E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		
Compliance Indicator	E.4 - The agency has effective and accurate data collection systems in place to evaluate its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes		
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(3)]	Yes		

E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		
Compliance Indicator	E.5 - The agency identifies and disseminates significant trends and best practices in its EEO program.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes		Using the MD-715 and other workforce data to monitor the progress of established planned activities to eliminate identified triggers and potential barriers to equal employment opportunity.
E.5.b	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes		In FY 2022, HUD conducted benchmarking with several agencies and adopted ideas for conducting barrier analysis and utilizing stakeholders and resources to support recruitment of groups with low participation.

E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		
ESSENTIAL ELEMENT F: RESPONSIVENESS AND LEGAL COMPLIANCE - <i>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</i>				
Compliance Indicator	F.1 - The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.			
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		

F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		
Compliance Indicator		F.2 - The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes		
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		

F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		
Compliance Indicator		F.3 - The agency reports to EEOC its program efforts and accomplishments.		
Measures		Measure has been met?		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
		Yes	No	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		

Part H: EEO Plan To Attain The Essential Elements Of A Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency - H1 – Closed.

Type of Program Deficiency	Brief Description of Program Deficiency
<p><u>Element A</u> <i>Demonstrated Commitment from Agency Leadership</i></p> <p><u>Element B</u> <i>Integration of EEO into the Agency’s Strategic Mission</i></p>	<p>The agency has not disseminated the Anti-harassment policy and procedures to all employees. (A.2.a.1)</p> <p>The agency has not informed its employees about the Anti-harassment program. (A.2.c.4)</p> <p>All managers and supervisors have not received orientation, training, and advice on their responsibilities under the Anti-harassment policy. (B.5.a.3)</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
9/30/2010	In accordance with EEOC MD-715, Federal agencies must have in place an effective anti-harassment program to address sexual and non-sexual harassment and establish a separate independent investigatory process and procedure.	11/30/2020	09/30/2022	07/21/2022

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
07/30/2020	Submit the final Anti-Harassment Program and procedures document to internal HUD stakeholders for final review and concurrence that includes EEOC guidance contained in the July 6, 2017 Technical Assistance letter.	Yes	09/30/2021	09/30/2021
10/01/2020	Disseminate EEOC Approved Anti-Harassment Program to all HUD employees (e.g., new employees at orientation, newly appointed managers and supervisors into the managerial/supervisory ranks, and employees attending related trainings) via the HUD@Work website. <i>(Part G – A.2.a.1 and A.2.c.4)</i>	Yes	09/30/2022	07/21/2022
09/30/2023	Provide orientation, training, and advice to all managers and supervisors on their responsibilities under the Anti-harassment policy. <i>(Part G – B.5.a.3)</i>	Yes		07/21/2022

Report of Accomplishments

Fiscal Year	Accomplishments
2022	The Agency has staffed the AHP with a program Director and two AHP Investigators/SME. The Agency has also appropriated funds to add two additional investigators to the team along with an administrative support team member.
2022	HUD's AHP was reviewed/approved by the EEOC's Office of Federal Operations Agency Oversight Division
2022	The AHP policy and program were disseminated to the entire workforce on July 21, 2022.
2022	Supervisors/managers were provided training access on July 21, 2022, another training session on September 19, 2022.

2022	AHP training was made available within the Agency's Learning Management System. This training includes examples of disability-based harassment and included tools for supervisory and non-supervisory staff.
2022	OCHCO office tracks the processing of AHP complaints to accurately collect, monitor, and analyze the data. All harassment complaints received by the AHP are processed within 3 to 10 days of notification.
2021	The final policy and procedure successfully passed departmental clearance and was sanctioned by the EEOC oversight team (the program will be live by 09/30/2022).
2020	HUD completed an interim Anti-Harassment Program. The final is currently in the departmental clearance process.
2020	Submitted a final policy document to internal HUD stakeholders for final review and concurrence that includes EEOC guidance contained in the Technical Assistance letter.
2019	HUD introduced a new initiative titled Harmony and Respect at HUD: Civility Matters by conducting a mandatory training for all HUD employees, designed to raise awareness of inappropriate workplace behaviors, including harassment, and resources and tools to resolve conflict.
2019	HUD finalized its Anti-Harassment Program and submitted it into HUD's internal clearance process, which includes a review by HUD Unions. In addition, the Secretary's Anti-Harassment Policy Statement was reissued on July 19, 2018, addressing deficiencies identified in the EEOC's July 6, 2017 Technical Assistance letter.
2019	HUD ensures EEO and Diversity and Inclusion related training, which includes sexual harassment, is presented annually to employees. The training teaches participants the types of sexual

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency – H2

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	The agency has not completed all investigations within the applicable prescribed time frame. (E.1.f.)

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2017	Establish an effective EEO complaint processing program that timely completes EEO investigations within 180 days and FADs within 60 days of the request. <i>(Part G – E.1.f.)</i>	09/30/2020	09/30/2023	

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2023	Revise complaint process to decrease processing times. Formal complaints are acknowledged within 5 calendars of receipt. Acceptance/dismissal (A/D) decisions are prepared and provided within 30 calendar days of formal filing. Final Agency Decisions (FADs) are requested and/or initiated not more than 30 days of FAD election/order and not more than 40 days when an election has not been provided by the Complainant.	Yes		
9/30/2023	Meet quarterly with contract investigators to identify and address processing deficiencies. Request investigations 1 to 3 calendar days after acceptance decision issued. Review and return investigative plans, and reports of investigations (ROI) within 3 – 5 calendar days of receipt.	Yes		
09/30/2022	Standardize SOPs for the internal processing of EEO complaints	Yes	02/26/23	
09/30/2022	Fill two critical EEO Specialist GS-12/13 Career Ladder Positions; one GS-7/9/11 EEO Intake Specialist	Yes	04/01/23	
09/30/2021	Timely fill the critical vacancy of the Equal Employment Opportunity	Yes		08/29/2021

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
	Division Director position within ODEEO.			
09/30/2020	Award a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions. <i>(Part G – E.4.a.1.)</i>	Yes	06/30/2021	09/23/2021
09/30/2020	Continuously review EEO investigation processing to improve efficiency and thoroughness. <i>(Part G – E.1.f.)</i>	Yes	9/30/2021	09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
2022	Currently, there is staff serving in ODEEO with the sufficient professional background to review FADs, settlement agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents.
2022	HUD filled the critical vacancies of the Equal Employment Opportunity Division Team Lead and two Equal Employment Specialists
2022	Procured iComplaints (EEO complaint tracking system) to effectively monitor and manage complaint activity.
2022	Increased marketing and awareness of ADR to increase participation in ADR for early EEO complaint and employee dispute resolution.
2021	Continuously review EEO investigation processing to improve efficiency and thoroughness.
2021	Timely filled the critical vacancy of the Equal Employment Opportunity Division Director position within ODEEO.
2021	Awarded a new EEO investigations contract to enhance timeliness through improved quality assurance and accountability provisions.
2020	Continuing to work toward improving complaint processing to timely complete investigations and FADs.

2020	HUD hired two key EEO personnel in FY 19 instrumental to ensuring timely and efficient EEO complaint processing. First, HUD hired a new Team Lead to assist with the implementation of an effective EEO complaint management system that consistently ensures quality and efficient EEO complaint processing. In addition, HUD hired an EEO Program Analyst to advise on the effectiveness and efficiency of HUD's EEO complaint tracking system, identify deficiencies and recommend solutions.
2019	FAD issuance remained within the statutory timeframe for the second year in a row. HUD's FY 19 average FAD issuance rate was 59 days.
2017	A new EEO Division Director was hired in February 2017 and a new Team Leader was assigned.
2017	Increased staff accountability by inserting new elements on performance plans.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency – H3 CLOSED

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	Low participation rate in ADR process. <i>(Based on EEOC’s Technical Feedback Letter dated September 2, 2020 - E.3.a-f)</i>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
9/30/2017	To develop a plan to consistently increase participation in the ADR process.	9/30/2020		09/30/2022

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Meet with union officials to foster a collaborative relationship in favor of the ADR program. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes	09/30/2023	
09/30/2021	Conduct a climate assessment survey to ascertain the reasons why employees are reluctant to participate in ADR. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes	09/30/2023	
09/30/2021	Ensure that the individual with settlement authority is not directly involved in the case. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>	Yes		09/30/2021
09/30/2020	Implemented a five-calendar day settlement agreement concurrence review period.	Yes	09/30/2021	09/30/2021
09/30/2020	Provide ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.	Yes	09/30/2021	09/30/2021
09/30/2019	Publish ADR procedures to outline roles and responsibilities of offering ADR.	Yes	03/31/2023	09/30/2022

09/30/2019	Create training materials to provide responsible officials with information regarding resources and process to resolve informal EEO complaints.	Yes	03/31/2023	09/30/2022
09/30/2019	Train EEO counselors and ADR specialists in the process of offering and recording offers of ADR and implementing quarterly ADR review of cases.	Yes	09/30/2021	09/30/2021
09/30/2019	Update pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.	Yes	09/30/2021	09/30/2021
09/30/2017	Promote ADR to employees, supervisors, and senior leadership.	Yes	9/30/2021	09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
2022	Provided ADR training to approximately 1,120 employees and managers.
2022	Scripted and created a marketing video to promote ADR.
2022	Increased ADR participation by 150%
2021	Provided ADR training to HUD employees to increase awareness and understanding of ADR process and purpose.
2021	Ensured that the individuals with settlement authority are not directly involved in the case. <i>(Activity recommended by EEOC via the 09/02/2020 Technical Assistance Letter)</i>
2021	Implemented a five-calendar day settlement agreement concurrence review period.
2021	Promoted ADR to employees, supervisors, and senior leadership during quarterly GDAS meetings with ODEEO
2021	Trained EEO counselors and ADR specialists in the process of offering and recording offers of ADR, and implementing quarterly ADR review of cases;

2021	Updated pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.
2020	ADR training was provided to management and employees; however, this objective has been impacted by the COVID-19 pandemic. Continuing to work toward five-calendar day settlement concurrence review period.
2018	HUD established ADR standard operating procedures to enhance the efficiency and effectiveness of the program in FY 2018. This tool is also being used to develop effective training for employees, supervisors, and managers during FY 2019.
2018	HUD conducted a review of the ADR program to analyze data and provide recommendations for program enhancement.
2017	In September 2017, HUD produced two videos on the benefits of the ADR program and promotes ADR during its annual EEO and diversity conference.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency – H4 – CLOSED

Type of Program Deficiency	Brief Description of Program Deficiency
<u>Element E</u> <i>Efficiency</i>	The agency did not have a system in place to accurately collect, monitor, and analyze the following data: EEO Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official until September 2021. <i>(E.4.a.1)</i>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
06/04/2019	Establish a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system.	02/07/2020		04/14/2022

Responsible Official(s)

Title	Name	
General Deputy Assistant Secretary for Administration	Kevin McNeely	Yes
Chief Procurement Officer (CPO)	Jimmy Fleming Scott	Yes
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Title	Name	
Director, Equal Employment Opportunity Division	Rodney Cox	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2020	Migrate HUD’s historical EEO data to newly acquired EEO tracking system. <i>(Part G – E.4.a.1)</i>	Yes	09/30/2022	09/30/2022
02/07/2020	Train EEO specialists and personnel to use the new EEO tracking system.	Yes	09/30/2022	09/30/2022

Report of Accomplishments

Fiscal Year	Accomplishments
2022	Successfully migrated historical data to iComplaints EEO complaints tracking system.
2021	Established a comprehensive system to accurately collect, monitor and analyze EEO complaint data, transfer all historical EEO data into the new system, and train EEO specialists to effectively use the new system.
2020	The previous contract was terminated due to performance challenges and acquisition of a new EEO tracking system was pending. Implemented an electronic filing system to improve the efficiency and management of case activity. Review of EEO investigation processing improved resulting in a decrease of untimely investigations.
2019	HUD awarded a new contract for an EEO complaint tracking system. In 2019, HUD lost access to its EEO complaint tracking system due to contractual challenges. Immediately, HUD’s EEO office created and implemented a stopgap measure to track EEO data and ensure the continuation of accurate and timely processing of EEO complaints.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency – H5 CLOSED

Type of Program Deficiency	Brief Description of Program Deficiency
<p>Element C <i>Management and Program Accountability</i></p>	<p>HUD does not collect the required applicant flow data necessary to determine what part of the recruitment and selection process requires further evaluation. (C.4.c)</p> <p><i>NOTE: The recommendations for compliance for this deficiency were presented to HUD by EEOC, in their September 2, 2020, summary report/letter of findings based on the previously conducted Technical Assistance Teleconference, which was held on March 18, 2020.</i></p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/02/2020	<p>Establish a plan to collect applicant flow data that identifies:</p> <ol style="list-style-type: none"> 1. The number of applications received for: (a) New hires to mission critical occupations; (b) Internal competitive promotions to mission-critical occupations; (c) Internal competitive promotions to the senior grade levels; and (d) Career development programs. 2. The number of individuals who qualified for: (a) New hires to mission critical occupations; (b) Internal competitive promotions to mission-critical occupations; (c) 	09/30/2022		09/30/2022

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
	Internal competitive promotions to the senior grade levels; and (d) Career development programs.			

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Office of the Chief Human Capital Officer (OCHCO)	Lori Michalski	Yes
Director, Office of Departmental Equal Employment Opportunity (ODEEO)	Wayne A. Williams	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Meet with OCHCO to identify if the current data collection system can be modified/updated to collect the required applicant flow data.	Yes		08/03/2021
09/30/2022	Obtain required applicant flow data from the new data system platform necessary to conduct a thorough barrier analysis on HUD Mission Critical Occupations (MCO).	Yes		09/30/2022

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2023	OCHCO plans to work with ODEEO as necessary to develop drill-down and/or aggregation capabilities with the Applicant Flow raw data.			4/30/2022

Report of Accomplishments

Fiscal Year	Accomplishments
2022	By the close of FY 2022, HUD had obtained access to applicant flow data in USA Staffing Cognos reporting tool for GS positions.
2021	Setup Bi-monthly Data Check-in meetings between OCHCO and ODEEO to review current and anticipated data needs and follow up on the progress of acquiring the applicant flow data necessary for EEOC compliance (ONGOING).
2021	HUD transitioned to USASTaffing mid-April 2021. This new platform provides on-demand reporting across all submitted data elements of a Job Opportunity Announcement (JOA) posted on USAJobs – a big improvement from CareerConnector which limited reportable data elements.

Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

Statement of Model Program Essential Element Deficiency – H6

Type of Program Deficiency	Brief Description of Program Deficiency
<p><u>Element C</u> <i>Management and Program Accountability</i></p>	<p>The agency does not process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures. C.2.b.5</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2022	To process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in the HUD reasonable accommodation procedures (30 days)			

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Reasonable Accommodations Branch	Tammy Lawrence	Yes
Chief Human Capital Officer	Lori Michalski	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2023	To reduce the processing times of reasonable accommodation cases, the Reasonable Accommodations Branch (RAB) plans to on-board two (2) new Reasonable Accommodations Case Managers this fiscal year;	Yes		
09/30/2023	Collaborate with other stakeholder offices involved in processing RA cases to establish case processing deadlines in those offices;	Yes		
09/30/2023	Partner with the Office of General Counsel in FY 2023 to develop new training for supervisors, which will reiterate expectations for timely processing of cases.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments

Part I: Agency EEO Plan to Eliminate Identified Barrier

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

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

Statement of Condition That Was a Trigger for a Potential Barrier I1

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A1	Low Participation Rate of Hispanic-Latino Males (3.85% vs. 6.82% CLF) and Females (4.97% vs. 6.16%) in the permanent workforce when compared to the Civilian Labor Force (CLF).

EEO Group(s) Affected by Trigger

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	A1 Table
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
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)

Description of Policy, Procedure, or Practice

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
At the end of FY 2022, the HUD Barrier Analysis Team initiated biweekly meetings and has broken the analysis process into five areas to research policies, procedures, and practices for recruitment, hiring, promotions, retention, and training. No conclusion had been made at the end of FY 2022.	08/21/2021	09/30/2023	Yes		
Convene Hispanic Working Group among Barrier Analysis Team/HR Partners to conduct Barrier Analysis	10/01/2021	09/30/2022	Yes		11/4/2022

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)
03/30/2023	Schedule Quarterly meetings to establish the agency Hispanic Recruitment Plan		
4/1/2023	Quarterly Trigger Strategy Briefings to address low participation and retention of Hispanics		
06/01/22	Invite the Recruitment and Staffing Division to join EEO and DEIA at Quarterly Senior Leader Program Office and Regional Administrator briefings.		05/01/22
05/31/2022	Identify specific objectives, strategies, and action steps to complete barrier analysis.	11/04/2022	11/04/2022
11/01/2022	Develop draft recommendations/action plan to incorporate into the Agency’s Hispanic Employment Plan with recruitment and hiring timelines and strategic goal and accomplishments that will reflect the increase of the participation of Hispanic employment.	09/30/2023	

Report of Accomplishments

Fiscal Year	Accomplishments
2022	ODEEO hosted 2 nd EEOC Barrier Analysis training for HUD Barrier Analysis Team members
2022	Trigger Strategy Briefing addressed low participation and retention of Hispanics. Program offices joined ODEEO, HUD Recruitment and Staffing Division, and subject matter experts for a briefing on hiring authorities, recruitment resources and strategies, and sharing best practices for retaining employees.

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.

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.

New Hires for MCO 1101 (PWD) Answer: No

New Hires for MCO 1101 (PWTD) Answer: No

Response: No trigger for New Hires in MCO 1101 (PWD and PWTD).

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.

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

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	0.00%	0.00%	N/A	N/A
Mentoring Programs	46	46	32.61%	32.61%	N/A	N/A
Coaching Programs	49	49	0.00%	0.00%	N/A	N/A
Training Programs	76	76	10.53%	10.53%	N/A	N/A
Detail Programs	39	39	20.51%	20.51%	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.

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.

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 (0.00%) 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: The 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.

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.

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.

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.

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 for 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 for 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.

- c. New Hires for 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.

- 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 accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, 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 request 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 provide 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 a 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 a 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 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 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> • 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
