



FY 2017

## Equal Employment Opportunity Commission (EEOC) Management Directive 715 Report

EEOC MD 715 provides policy guidance and standards for establishing and maintaining effective affirmative programs of equal opportunity under Section 717 of the Title VII of the Civil Rights Act of 1964 and Section 501 of the Rehabilitation Act of 1973. This directive requires HUD to take appropriate steps to prevent discrimination in employment decisions.

Prepared by the Office of Departmental Equal Employment Opportunity

# Table of Contents

Office of Departmental Equal Employment Opportunity Director’s Message.....	3
Agency Mission.....	4
Introduction .....	5
Section I: Model EEO Program	
Parts A – D.....	6
➤ Part A - Department or Agency Identifying Information	
➤ Part B - Total Employment	
➤ Part C - Agency Official(s) Responsible for Oversight of EEO Program(s)	
➤ Part D - List of Subordinate Components Covered in This Report	
Part E: Executive Summary.....	10
➤ Essential Element A.....	12
➤ Essential Element B.....	13
➤ Essential Element C.....	15
➤ Essential Element D.....	16
➤ Essential Element E.....	19
➤ Essential Element F.....	20
Part F: Certification of Establishment of Continuing Equal Employment Opportunity Programs.....	21
Part G: Agency Self-Assessment Checklist Measuring Essential Elements .....	23
Part H: EEO Plan to Attain the Essential Elements of a Model EEO Program.....	49
Part I: EEO Plan to Eliminate Identified Barriers.....	65
Part J: Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities.....	78
➤ Section I: Efforts to Reach Regulatory Goals .....	79
➤ Section II: Model Disability Program .....	80
➤ Section III: Program Deficiencies in the Disability Program.....	82
➤ Section IV: Plan to Recruit and Hire Individuals with Disabilities.....	83
➤ Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities.....	86
➤ Section VI: Plan to Improve Retention of Persons with Disabilities.....	92
➤ Section VII: EEO Complaint Data Involving Harassment.....	95
➤ Section VIII: Identification and Removal of Barriers .....	96
Appendices	



---

As the Director of the Office of Departmental Equal Employment Opportunity for the U.S. Department of Housing and Urban Development (HUD), it is my honor to present *HUD's Annual EEOC Management Directive (MD) 715 Report for Fiscal Year 2017*". The attached report will summarize the Department's efforts to maintain an effective affirmative program of equal employment opportunity under Section 717 of the Civil Rights Act of 1964 and Section 501 of the Rehabilitation Act of 1973 and addresses our goals in developing and implementing a more comprehensive, integrated, and strategic focus on EEO and diversity and inclusion.

As outlined in this report, HUD has had notable success in strengthening areas previously cited by the Equal Employment Opportunity Commission as deficiencies. Going forward, this guidance will serve as a reminder and reinforce the standards for complying with Federal EEO laws, regulations, and management directives.

In addition, ODEEO and the Office of the Chief Human Capital Officer (OCHCO), a division under the Office of the Assistant Secretary for Administration (OASA), will continue to partner and work collaboratively to support inclusive diversity and engagement through increasingly innovative policies, programs, and initiatives.

Finally, I would like to take this opportunity to thank our colleagues and stakeholders for their on-going engagement and dedication to EEO and diversity at HUD and across the Federal government. The support that we provide to one another is critical to the successful implementation of our respective EEO and diversity programs. With your support, the Department will continue to deliver services at the highest level possible to the American people.

John P. Benison, Director  
Office of Departmental Equal Employment Opportunity (ODEEO)  
U.S. Department of Housing and Urban Development



## OUR MISSION

*HUD's mission is to create strong, sustainable, inclusive communities and quality, affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination; and transform the way HUD does business.*

## Forging a New HUD Together!

***Reimagine the way HUD works.*** Reimagining how we function as a department requires us to take a close look at how we deliver our services and work with each other.

***Restore the American Dream.*** HUD is working to ensure all families have access to quality, affordable homes. We will renew our commitment to increase homeownership for first-time buyers in a way that maintains our financial viability; look at the way we provide rental assistance, so we can provide sustainable, reliable assistance; and perhaps most importantly, we must advance our efforts to end Veteran homelessness.

***Rethink American communities.*** Our communities need to be the foundation for America's success. As we ensure affordable housing for every American, we must promote economic mobility, which allows families to get on the path to self-sufficiency.

## INTRODUCTION

HUD is a \$46.9 billion agency in which approximately 85 percent of its total budget is needed solely to renew rental assistance to 5.6 million households occupying HUD-subsidized housing, including 2.25 million households assisted with Housing Choice Vouchers, and to renew existing HUD grants to homeless assistance programs. Detailed data on 4.68 million households reveal that: 56.5 percent are elderly or disabled, 73.5 percent are extremely low-income (below 30 percent of area median income) and an additional 20.8 percent are very low income (below 50 percent of area median income).

Our strategy is to refocus HUD on its core mission and modernize its approach by leveraging private-sector partnerships, strengthening the housing market, and encouraging affordable housing investment, while redesigning internal processes. A primary goal of HUD's four-year vision is to reimagine how the Department works, how it delivers services and how it might do so more efficiently and effectively. Reimagining how HUD works also means that, as stewards of the public trust, all of HUD's leadership and staff must take ownership of what the Department does and be accountable as public servants. The Department is rethinking our business from the bottom up by engaging HUD's career professionals, the folks who know what works well and what changes we can make to be more responsive to the American people.

HUD continues to build on its progress by laying out priorities and goals to accelerate the gains already made and ensure that we maintain our focus on strengthening the Nation's housing market to spur economic growth and protect consumers. Stable housing is an important tool in helping households achieve other life outcomes, and we are working every day to give families access to these opportunities. We strive to build strong and inclusive communities that connect housing with other important community assets: good jobs, quality schools, and safe streets. With this comprehensive approach, we will turn neighborhoods with problems into neighborhoods with promise, giving more families a chance to thrive and succeed.

In total, HUD's *Strategic Plan 2014–2018* represents an opportunity agenda. By giving more families a fair shot at fulfilling their promise, we strengthen communities and our Nation as a whole.

# **SECTION I**

## **THE MODEL EEO PROGRAM**

### **PARTS A – D**

# PARTS A – D

## PART A - Department or Agency Identifying Information

Agency	2 <sup>nd</sup> level reporting component	Address City, State Zip Code	CPDF Code (xxxx)	FIPS Code
HUD		451 7 <sup>th</sup> 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	7,735	102	N/A	7,837

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

Agency Leadership	Name	Title
Head of Agency Official Title	Dr. Benjamin S. Carson	Secretary, U.S. Department of Housing and Urban Development
Agency Head Designee	Pam Hughes Patenaude	Deputy Secretary, U.S. Department of Housing and Urban Development
Principal EEO Director/Official Title/Series/Grade	John P. Benison <a href="mailto:john.p.benison@hud.gov">john.p.benison@hud.gov</a>	Director, Office of Departmental Equal Employment Opportunity, ES-0260-00, (202) 708-3362
Title VII Affirmative EEO Program Official	Stephen D. Smith <a href="mailto:stephen.d.smith@hud.gov">stephen.d.smith@hud.gov</a>	Director, Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-2734
Section 501 Affirmative Action Program Official	Jackie Cumber <a href="mailto:jackie.p.cumber@hud.gov">jackie.p.cumber@hud.gov</a>	Branch Chief, Reasonable Accommodations Branch, Health and Wellness Division, Office of Chief Human Capital Officer, GS-0201-14 (202) 402-6639
Complaint Processing Program Manager	Tami L. Wright <a href="mailto:tami.l.wright@hud.gov">tami.l.wright@hud.gov</a>	Director, Equal Employment Opportunity Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-6818
ADR Program Manager	Tami L. Wright <a href="mailto:tami.l.wright@hud.gov">tami.l.wright@hud.gov</a>	Director, Equal Employment Opportunity Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-6818
Principle MD-715 Preparer	Patrice L. Wilson <a href="mailto:patrice.l.wilson@hud.gov">patrice.l.wilson@hud.gov</a>	Diversity Program Manager, Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-13, (202) 402-6502





Have the following forms and/or documents been uploaded?	(Please respond "Yes" or "No")	Comments
*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities (Part J)	Yes	
<b>Appendices</b>		
*Organizational Charts	Yes	
*Delegation of Authority	Yes	
*Copies of relevant EEO Policy Statement(s)		
EEO Policy Statement	Yes	
Alternative Dispute Resolution (ADR) Policy Statement	Yes	
Anti-Harassment Policy Statement	Yes	
Diversity and Inclusion Policy Statement	Yes	
*Analysis of EEOC 462 Report	Yes	
*Agency's Strategic Plan 2014-2018	Yes	
*Agency's Human Capital Strategic Plan 2015-2018	Yes	
*Agency's Human Capital Succession Plan 2015-2018	Yes	
*FEORP Report	Yes	
*Federal Employee Viewpoint Survey (FEVS)	Yes	
*Glossary of Terms & Acronyms	Yes	
*Copies of Workforce Data Tables	Yes	
*Agency's Employee Engagement Plan	Yes	

# **PART E**

## **EXECUTIVE SUMMARY**



The U.S. Department of Housing and Urban Development (HUD) is pleased to present its EEOC Management Directive (MD) 715 Equal Employment Opportunity (EEO) Program Status Report for Fiscal Year (FY) 2017. This report addresses all the required elements of the MD-715 for building and sustaining an effective affirmative program of equal employment opportunity (Model EEO Program).

The U.S. Department of Housing and Urban Development (HUD) is a cabinet-level agency who employs approximately 7,800 employees in its Headquarters (HQ) and ten Regional Offices, who support the Department by providing a wide array of programs and services, including: community planning and development initiatives, housing counseling for the homeless, single and multifamily mortgage insurance programs, public housing programs, and protecting children from the hazards of lead paint. Other program responsibilities include developing and preserving quality and affordable homes, focusing on physical, social economic and environmental community sustainability, and ensuring fair housing choice and equal opportunity for all people pursuing the promise of a better life.

The Department is committed to strengthening the nation's housing markets to bolster the economy and protect customers. HUD's programs provide a platform to improve the quality of life, especially in some of the nation's hardest-hit neighborhoods. HUD fulfills these responsibilities through a variety of means, such as: providing options to help homeowners finance home purchases; supporting loss mitigation efforts for homeowners experiencing hardships (e.g., at risk of foreclosure); administering oversight and selective intervention services to improve management of public and assisted housing; supporting programs to reduce homelessness; developing viable communities through public and private partnerships; and facilitating initiatives to make homes healthier, greener and more efficient for residents.

Fundamental changes have been implemented in the HUD structure and delivery of technical assistance for the improvement of its program and services. As an example, building requirements have been changed to adapt to the environment and address social needs and fair housing concerns which have taken on a greater prominence in administering the various programs and services. HUD has, and will continue to reinvent itself by implementing a number of initiatives and mandates in fully supporting all of its program efforts.

In establishing and maintaining a model EEO program (as required under both Title VII of the Civil Rights Act of 1964 (Title VII) and Section 501 of the Rehabilitation Act of 1973 (Rehabilitation Act), an agency should incorporate into the design a structure for effective management, accountability and self-analysis which will ensure program success and compliance with the EEOC MD 715. Agency programs and policies should be evaluated regularly to ascertain whether the Agency and such programs have achieved the goal of a discrimination free work environment, characterized by an atmosphere of inclusion and free and open competition for employment opportunities. EEOC MD 715 divides the essential elements of a “Model EEO Program” into six (6) broad categories, as listed: 1) Demonstrated commitment from agency leadership; 2) Integration of EEO into the agency's strategic mission; 3) Management and program accountability; 4) Proactive prevention of unlawful discrimination; 5) Efficiency; and 6) Responsiveness and legal compliance.

### **ESSENTIAL ELEMENTS**

**Essential Element A: Demonstrated Commitment from Agency Leadership** – Requires the Agency Head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

- Secretary Carson affirmed his commitment to the principles of EEO, and diversity and inclusion by issuing an [EEO Policy Statement](#), [Alternative Dispute Resolution \(ADR\) Policy Statement](#), and [Anti-Harassment Policy Statement](#) on July 26, 2017, less than six months from the beginning of his tenure and significantly earlier than the EEOC requirement of nine months thus illustrating his desired commitment to safeguarding EEO and strategic diversity management principles. All respective policy statements were disseminated to all HUD employees via global email, internet and intranet sites. In addition, the Secretary, through a department-wide communication, reissued the Anti-Harassment Policy Statement in November 2017 as a means of proactively reinforcing this important requirement during a time in which significant allegations of harassment are arising throughout society.
- Secretary Carson issued a [Diversity and Inclusion Policy Statement](#) demonstrating his commitment to managing diversity and inclusion efforts through active engagement of leadership, engagement of everyone in the workplace, and optimizing inclusive diversity using data-driven approaches. At HUD, we value each other, demonstrate compassion for those we serve, and treat others the way we would like to be treated. In respecting others, we conduct our work and administer our programs with fairness, equality, and a commitment to civil rights, diversity and inclusion, and employee engagement.

**Essential Element B: Integration of EEO into the Agency’s Strategic Mission** – Requires that the agency’s EEO programs be organized and structured to maintain a workplace that is free from discrimination in all of the agency’s policies, procedures and practices while in supporting the agency’s strategic mission.

- The Secretary and Deputy Secretary of HUD delegate all responsibilities for the administration, management, and enforcement of all applicable EEO, civil rights, and diversity laws, regulations, and related matters to the Director of the Office of Departmental Equal Employment Opportunity (ODEEO).

ODEEO's program goals and objectives are integrated into [HUD's Strategic Plan 2014-2018](#) serves as HUD's equal employment opportunity policy arm and is responsible for ensuring the enforcement of federal laws relating to the elimination of all forms of discrimination in the Department's employment practices and to ensure equal employment opportunity. ODEEO promotes diversity and inclusion, fosters a workplace culture that respects differences, and empowers the full and fair participation of all employees in all aspects of HUD work life. Additionally, ODEEO is responsible for leading the Department's efforts to proactively prevent unlawful discrimination. ODEEO also seeks to foster an agency culture in which disputes are resolved at the lowest possible level and before a formal complaint is filed.

In accordance with ODEEO Management Objectives, per HUD's Annual Performance Plan, three performance-related objectives are reported annually to the President, Congress and the American public, which includes: 1) Maximizing EEO training opportunities for all HUD employees; including quarterly training programs, workshops, and online training courses on the EEO process made available to the entire HUD workforce and providing an overview of the EEO process to new employees during their orientation; 2) Establishing HUD as a model EEO program. ODEEO works with the unions to integrate EEO principles into all non-supervisory employee's performance standard and established an EEO performance standard for all supervisory employees to demonstrate commitment from agency leadership. ODEEO promotes the use of Alternate Dispute Resolution throughout the Department; and 3) Proactively tracking EEO data in order to identify and address EEO issues. ODEEO provides direction, guidance, and monitoring of key activities on a quarterly basis to ensure the successful implementation of the principles of EEO in the program areas.

- ODEEO continues to serve as a resource to program office leadership by providing direction, guidance, and monitoring of key activities to ensure the successful implementation of the principles of EEO throughout the Department.
- Through efforts of ODEEO and OASA, HUD has engaged leaders on the importance of an inclusive and diverse workforce by motivating and effectively communicating with employees through various training initiatives throughout the fiscal year, reaching almost 10% of our total population. As a result, leaders are learning to effectively eliminate barriers and utilize tools that demonstrate their support for this initiative. OASA has developed a human capital dashboard for HUD managers which includes real time diversity data. The dashboard will be fully deployed in FY18. HUD continues to develop and implement broad outreach strategies to attract employees at all levels which are consistent with merit system

principles. example, HUD has created a Senior Executive Service Candidate Development Program and partnered with the U.S. Department of Interior in developing program candidates.

- HUD’s efforts are further strengthened through participation and collaboration with the employee resource/affinity groups, along with their involvement on the Diversity Council and other HUD diversity and inclusion sponsored events.
- In working to be proactive in promoting a culture of diversity and inclusion, ODEEO conducted focus groups to better understand HUD employees’ day-to-day experiences and have in-depth discussions on their perceptions of fairness and opportunity in the workplace. ODEEO aimed to obtain feedback from employees about the culture that contributes to the “EEO climate,” including Race/Ethnicity, Sexism/Gender discrimination, Veterans, Disabilities, and Age. Essentially, they wanted to know if employees believe that the Department is a good place to work where all feel included and can succeed to their fullest potential.

The focus groups were conducted to evoke much more nuance and understanding about employees’ experiences than a survey could achieve. The results of the focus groups will be used to help ODEEO tailor the policies they establish and the training programs that they offer to meet the needs of the Department’s employees. In addition, ODEEO will use the results to determine if a broader EEO climate survey of a larger sample of the workforce is needed.

- ODEEO, through HUD’s Virtual University (HVU), received 100% participation and completion on the mandatory No FEAR Act training.

**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.

- At HUD, we maintain open dialogue with managers/supervisors, and employees through various internal communication platforms, social media, newsletters, email blasts, etc., as well as HUD’s Diversity Council (Council). The Council is intended to identify workplace issues and/or enhancements to support the recruitment, hiring, professional development, and retention of diverse employees. Through the Council, we continue to support participation in employee affinity groups and provide access to senior leadership as the affinity group leaders hold a permanent seat on the Council.
- HUD leadership is committed to creating a culture of opportunity that is focused on fairness, service excellence, innovation, and increasing employee engagement thereby increasing the Department’s ability to meet its mission of creating strong, sustainable communities and quality homes for all. Through the guidance of the Office of Management and Budget (OMB) and the Office of Personnel Management (OPM), HUD’s FY 2017 [Employee Engagement Strategy and Action Plan](#) aims to strengthen employee engagement and organizational

performance by taking this five-step approach: 1) Refine and Communicate our Vision; 2) Analyze Engagement Data and Levels; 3) Establish Expectations and Tie to Department-wide Expectations; 4) Set Clear Goals; and 5) Action Steps. With approximately 7,800 employees geographically dispersed in 69 field offices, organized into ten regions, two-thirds of HUD employees are located outside of Headquarters in the field offices thus suggesting an even greater need to increase engagement.

- Additionally, we review and analyze the results of the FEVS to remain engaged with how our employees feel about the workplace as identified by the Inclusion Quotation (IQ) responses and exit interview survey data. This quantitative and qualitative data analysis is used to foster a more inclusive and engaging work environment and promote retention.
- HUD conducted annual [Ethics and Whistleblower Protection Act Training](#) to promote the highest ethical standards for all employees and cultivate a culture in which HUD program and services can be fully carried out with the utmost impartiality and integrity. The training was centered around issues related to employee standards of conduct, financial disclosures and the criminal conflicts of interest under Federal law. In addition, the training also covered legal opinions on political and official travel, the Hatch Act, gift acceptance, post-government employment restrictions, and HUD's Reform Act. Further, the Whistleblower Protection Act Training was centered around ensuring that employees who disclose allegations of serious wrongdoing or gross mismanagement are free from fear of reprisal for their disclosures. As a result, HUD received 100% participation and completion on both the mandatory Annual Ethics and Whistleblower Protection Act Trainings.

**Essential Element D: Proactive Prevention of Unlawful Discrimination** – Requires that the Agency Head make early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

- In FY 2017, ODEEO held meetings with three program areas that had findings of discrimination during the previous reporting period. ODEEO met with the head of each office and members of their leadership teams to discuss the case itself and what can be done in the future to prevent such incidents. Training resources and partnership opportunities were extended. The goals of the meetings were to help the program offices to understand what occurred and offer guidance on future prevention.
- HUD's ODEEO presented its 3<sup>rd</sup> Annual EEO and Diversity in the Workplace Conference that was extended to all Federal agencies. On June 20, 2017, the conference entitled "Building an Inclusive Workplace Together," provided a forum in which HUD and other Federal employees shared EEO and diversity best practices, discussed cross-cutting issues, and learned about new government-wide initiatives.

- Members from HUD’s employee resource groups: Robert C. Weaver Chapter of Blacks In Government (BIG); Widening Opportunities for Women (W.O.W.) Chapter of Federally Employed Women (FEW); AAPI Group; HUD LGBTQ group, FEDQ; HUD chapter of Image, Inc.; Latino Network; Advocates for HUD Employees with Disabilities (AHED); and, Veterans Affinity Group (VAG), came together to present an interactive training workshops which covered a variety of topics of interest to include Micro-Inequities/Micro-Triggers, a HUD Leadership Panel Discussion on Promoting EEO and Diversity, Prevention of Workplace Harassment, Affirmative Action for People with Disabilities in Federal Employment, a Limited English Proficiency Workshop, Veterans Leadership Cultivating a Strategic Advantage: Emotional Intelligence – A Veteran’s Survival Kit for a Public Career, and Speed Mentoring: Meeting Your Professional Development Match. In addition, HUD partnered with EEOC to deliver Lesbian, Gay, Bisexual, and Transgender (LGBT) training to employees.
- This training conference also provided participants with an opportunity to obtain resources that could support their professional and organizational development and network with colleagues representing a variety of interests. Importantly, the conference featured keynote addresses from several members of the HUD, EEOC, and the Diversity and Inclusion community.
- The Director of the ODEEO conducted hostile work environment (HWE) training for a large HUD Program Office after the completion of a harassment investigation. There was no finding of HWE, but there were several concerning discoveries. The training was intended to prevent workplace behaviors from worsening.
- ODEEO administered its flagship training program entitled “Civility in the Workplace” to employees and managers/supervisors across the respective program areas in HUD’s headquarters and field installations. The training focuses on a wide variety of behaviors and attitudes by offering a comprehensive learning solution based on realistic business simulations to spark new insights on how “doing what we’ve always done” is affecting results in ways participants may not have considered. The total number of HUD employees trained during FY 2017 is 272. Of the 272 employees trained, 97 were senior leaders and 175 were non-supervisory, all resulting in a satisfaction rate of 98.5%.
- ODEEO presented an EEO speaker series entitled, “Ready, Set, Go and Ask the EEO Expert.” In Part I of the series, EEO Experts guided participants through phases of the pre-complaint (counseling) process by interactively providing participants with an opportunity to identify and develop skills to navigate the complexities of the pre-complaint (counseling) process and leave with a better understanding of an effective counseling process and techniques to increase early resolution. Part Two of the series focused guiding participants through their



toughest challenges and answered questions they had regarding the formal stage of the EEO complaint process which includes Acceptance/Dismissal, Investigative, Hearings, FAD, Appeals, and/or final steps.

- To ensure fair recruitment and hiring practices, HUD is using a Power Business Intelligence Tool, along with workforce analytics data, the OASA conducted workforce analysis consistent with EEOC MD 715 instructions and when compared against the Civilian Labor Force, identified areas of low representation in our total workforce. The results were shared with all 17 program heads, as well as with ODEEO. In turn, ODEEO analyzed data findings at all grade levels, in all occupations and with emphasis on positions in the SES, managerial and supervisory ranks; including mission critical occupations. The initial assessment serves as the baseline data against which future progress will be measured.

HUD continues to engage with the appropriate diverse recruitment resources when filling senior level positions (SES, 13-15 or equivalent) through public posting and outreach. Our positions are open for a sufficient length of time to ensure broad distribution of the announcements to diverse sources, as well as, maximizing on the use of student internship and fellowship programs that have diverse pipelines to draw candidates. OASA has developed a human capital dashboard that includes real time diversity related data on the make-up of HUD's workforce. The dashboard will be deployed to agency program office managers in FY18. It also includes data related to succession planning, retirement eligibility and vacancies. The dashboard will serve as an effective tool to assist hiring managers and Departmental leadership addressing barriers to the recruitment and/or selection of individuals from diverse backgrounds.

- HUD acknowledged and honored all commemorative observances and activities by partnering with the Diversity Counsel, affinity groups, and internal stakeholders in promoting multi-cultural education and awareness. In addition, ODEEO's multi-cultural web-pages accompanies the Secretary's department-wide communications celebrating and honoring these respective commemorative observances thus supporting EEO, diversity and inclusion, and employee engagement initiatives. This [Commemorative Observances](#) webpage, which reaches all HUD-wide employees by way of HUD's intranet, includes short videos and information references that serve as an effective tool in providing diversity and sensitivity training.
- HUD attended seven career fairs promoting Veterans and PWD authorities to attract well-qualified candidates. The Department visited colleges and universities explaining the programs and the benefits of employment with HUD to a variety of individuals. HUD also pushed ambitious hiring initiatives utilizing other recruitment resources such as the Pathways and Peace Corps programs. As a result, HUD collected many job applications by the end of the fiscal year.
- The OASA continued the partnership with the Department of Veteran Affairs' (VA) initiative Vets2Feds. The relationship enabled HUD to reach veterans

recently leaving active military service, allowing HUD to reach more veterans for employment opportunities. All vacancy announcements included a noncompetitive appointment eligibility statement to attract qualified veteran applicants for employment under such appointing authorities as the 30% disabled veterans, Veterans Recruitment Appointment, and Schedule A Appointments.

- In the Partnerships for Public Service’s annual ranking of Best Places to Work in the Federal Government, HUD moved up from number 25 to number 21 on the list of midsize agencies in FY 2017 and increased by 4.2 points in employee satisfaction responses.
- In new employee orientation, HUD emphasizes the importance of completing the self-identification and accurately report their race/ethnicity, gender, disability, and veteran status to obtain current demographical information for developing more effective policies, programs, and to comply with government-wide and HUD reporting requirements. HUD resurveyed its workforce in FY 2017 to ensure an accurate reflection of workforce statistical information. This survey was a voluntary self-identification process and will be used in developing, monitoring, and reporting affirmative plans to identify, address, and eliminate potential barriers to recruitment and outreach, hiring, professional development, and the retention of HUD employees.
- The Selective Placement Program Coordinator provided regular [ABCs of Schedule A](#) training to all program hiring managers on all qualified hiring authorities and practices available with the goal of increasing HUD's usage of the Schedule A hiring authority and Veteran recruitment programs.

**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.

- HUD institutes a zero-tolerance standard for all types of discrimination, harassment, and civil rights violations of misconduct in the workplace and continues to be vigilant in taking prompt and immediate steps to address all allegations of discrimination, retaliation, and harassment.
- In addressing workplace disputes and conflict, HUD managers and supervisors are required to use and fully participate in Alternative Dispute Resolution (ADR) as a useful tool in promoting alternative approaches and methods for identifying, minimizing, and/or resolving workplace disputes and conflict in an expeditious, cost effective, non-reoccurring and mutually agreeable manner.
- In September 2017, ODEEO produced two videos on the benefits of the ADR program. One video was posted on the agencies website to meet their outreach and training objective for the ADR program. Further outreach efforts included ODEEO leading EEO and diversity conference and exhibiting at the Department’s Opportunity Expo. In addition, a training initiative is underway to promote the

HUD EEO Essentials training series that will include a training module on the ADR program as part of the standard curriculum. ODEEO is currently preparing standard operating ADR procedures to enhance the efficiency and effectiveness of the program.

### **EEO Complaints Activity**

- The iComplaints Case Management System allows HUD to track and monitor the complaint processing of EEO claims of discrimination from the initial pre-complaint (informal) stage of the process through its final action and/or closure. Simultaneously, HUD's ADR program is in place to monitor EEO activities in an effort to provide greater consistency in generating status reports throughout the year. HUD makes all attempts to process all investigations within the regulatory timeframes and has made great improvements from prior fiscal years. The adjudication function is separate from the complaints processing division and is not involved in the investigative process.
- HUD conducts training to all employees on the EEO complaints and ADR process to increase awareness of both life-cycles, in considering alternatives to resolving workplace disputes and conflict. In addition, HUD prominently displays EEO complaint posters, brochures, and other related reference materials throughout its Headquarters and field installations, as well as the Hud@work intranet site outlining the process and its timeframes.

**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.

- Per HUD's [Delegation of Authority](#), the Secretary and Deputy Secretary delegate responsibility for the administration, management, and enforcement of all applicable EEO, civil rights, and diversity and inclusion related statutes, regulations, and other related nondiscrimination matters to the Director of the ODEEO. In carrying out HUD's responsibility for ensuring compliance of the agency's EEO complaint process and its ADR Program by counseling, investigating, and adjudicating complaints filed by HUD employees and applicants for employment, ODEEO utilizes independent vendors to assist with effectiveness and efficiency of managing this Model EEO Program.
- HUD continues to comply with all statutory, regulatory, Executive Orders, policies and procedures governing Federal sector EEO and diversity and inclusion related matters that includes EEOC guidance, directives, final orders, and other related instructions.
- HUD continues to post all required No FEAR Act information on Hud@work intranet website, as well as the Department's external website, and thus requiring all new HUD employees to take the required No FEAR Act training within 30 days of their appointment. All current HUD employees are and have consistently participated in No

FEAR Act training on a semi-annual basis. These reports are timely filed as prescribed by Congress, Office of Management and Budget (OMB), EEOC, and the Office of Personnel Management (OPM).

### **State of the Agency MD-715 Briefing**

- In March 2017, the Office of Departmental Equal Employment Opportunity (ODEEO) presented its “State of the Agency Briefing” to the Secretary, Acting Deputy Secretary and other Senior Leaders of HUD, on maintaining a high performing and robust model EEO program for the Department. This briefing provided a forum to identify potential internal and external factors that may be impeding and/or contributing to triggers/barriers to our corporate mission, with developing keen strategies and approaches to address, mitigate, and eliminate such workplace barriers.
- Upon completion of the annual MD-715 Report, HUD will continue to disseminate its report to the Secretary, Deputy Secretary, all Principal Staff (Senior Leadership), and the Diversity Council.

# **PART F**

## **CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

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

I, **John P. Benison, Director** am the  
**Office of Departmental Equal Employment Opportunity, ES-0260-00**

(Insert name above) (Insert official title/series/grade above)

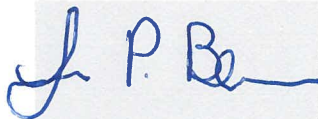
Principal EEO Director/Official for **U.S. Department of Housing and Urban Development (HUD)**

(Insert Agency/Component Name above)

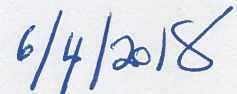
The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for 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, Sex 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.



John P. Benison, Director  
Office of Departmental Equal Employment Opportunity  
U.S. Department of Housing and Urban Development (HUD)



Signature of Principal EEO Director/Official

Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.



Dr. Benjamin S. Carson Sr., Secretary  
U.S. Department of Housing and Urban Development (HUD)

JUL 19 2018

Signature of Agency Head or Agency Head Designee

Date

# **PART G**

## **AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS**

**EEOC FORM 715-01**

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

<b>EEOC FORM 715-01 PART G</b>		<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>			
<b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>					
<b>Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.</b>					
A.1	Compliance Indicator	EEO policy statements are up-to-date.	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
	Measures		Yes	No	
A.1.a	Was EEO policy statement issued within 6 - 9 months of installation of Agency Head? (Please list date of agency head installation and date of issuance in the comments column.)	X			The Agency Head was installed on <b><u>March 2, 2017.</u></b>  An updated EEO policy statement was issued on <b><u>July 26, 2017</u></b>
A.1.b	During current Agency Head's tenure, has EEO policy statement been re-issued annually?	X			
A.1.c	Are new employees provided a copy of the EEO policy statement during orientation?	X			
A.1.d	When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?	X			



A.2	Compliance Indicator	EEO policy statements have been communicated to all employees.	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
	Measures		Yes	No	
A.2.a	Have the Heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?		X		
A.2.b	Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?		X		
A.2.c	Has the agency prominently posted such written materials in all personnel and EEO offices, and on the agency's internal website? [29 CFR 1614.102(b)(5)]		X		
A.3	Compliance Indicator	Agency EEO policy is vigorously enforced by agency management.	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
	Measures		Yes	No	
A.3.a	Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:				
A.3.a.1	Resolve problems/disagreements and other conflicts in their respective work environments as they arise?		X		

A.3.a.2	Address concerns, whether perceived or real, raised by employees and following up with appropriate action to correct or eliminate tension in the workplace?	X		
A.3.a.3	Support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?	X		
A.3.a.4	Ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO counselors, EEO investigators, etc.?	X		
A.3.a.5	Ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	X		
A.3.a.6	Ensure that subordinate supervisors have effective managerial communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	X		
A.3.a.7	Ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	X		
A.3.a.8	Ensure the provision of requested disability	X		

	accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?				
A.3.b	Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions? If yes, describe what means were utilized by the agency to inform its workforce about penalties for unacceptable behavior in the comments column.	X			
A.3.c	Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedure available on the World Wide Web or Internet?	X			
A.3.d	Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodations?	X			
<p align="center"><b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b></p> <p align="center"><b>Requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission.</b></p>					
B.1	Compliance Indicator	The reporting Structure for the EEO program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure 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
	Measures		Yes	No	

B.1.a	Is the EEO Director under the direct supervision of the Agency Head? [See 29 CFR 1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)		X		
B.1.b	Are the duties and responsibilities of EEO officials clearly defined?		X		
B.1.c	Do the EEO officials have the knowledge, skills and abilities to carry out the duties and responsibilities of their positions?		X		
B.1.d	If the agency has 2nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?				
B.1.e	If the agency has 2nd level reporting components, does the agency-wide EEO Director have authority for EEO programs within the subordinate reporting components? (If no, please describe how EEO program authority is delegated to subordinate reporting components, in Part H.)				
B.2	<b>Compliance Indicator</b>	The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing the agency head and senior management officials of	<b>Measure has been met</b>		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
	<b>Measures</b>		Yes	No	

		the status of EEO programs and are involved in, and consulted on, management/personnel actions.			
B.2.a	Does the EEO Director/Officer have a regular, effective means of informing the Agency Head and other top management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program?		X		
B.2.b	Following the submission of the immediately preceding MD-715 report, did the EEO Director/Officer present to the head of the agency and other senior officials the 'State of the Agency' briefly covering all components of the EEO report, including an assessment of the performance of the agency in each of the six elements of the Model EEO Program and a report on the progress of the agency in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?		X		
B.2.c	Are EEO program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?		X		The Director for ODEEO is fully engaged in the reshaping of HUD through the Department's Executive Resource Board, routing meetings with Departmental leadership, and by participating in executive level decisions on

				<p>organizational development, recruiting/outreach, hiring, retention, etc.</p> <p>In the second phase of implementation for HUD's Inclusive Diversity Strategic Plan for Fiscal Years (FY) 2017-2021, the Department will continue to establish a more collaborative partnership between OASA and ODEEO to ensure that all policies, programs, and systems fully support inclusive diversity through increasingly focused, innovative, and accelerated communication and learning strategies.</p>
B.2.c.1	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 re-alignments?	X		
B.2.c.2	Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [See 29 C.F.R. 1614.102(b)(3)]	X		

B.2.d	Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the agency's strategic mission?		X		
B.3	Compliance Indicator	The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.	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
	Measures		Yes	No	
B.3.a	Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?		X		
B.3.b	Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?		X		
B.3.c	Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?		X		
B.3.c.1	Is the Federal Women's Program sufficiently staffed - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204?		X		
B.3.c.2	Is the Hispanic Employment Program sufficiently staffed -		X		See Part H – Plan 3 (Closed)

	Title 5 CFR, Subpart B, 720.204?				
B.3.c.3	Is the People with Disabilities Program Manager; Selective Placement Program for Individuals with Disabilities sufficiently staffed - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102: 5 CFR 213.3102(u); 5 CFR 315.709?		X		
B.3.d	Are other agency Special Emphasis Programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as: FEORP - 5 CFR 720; Veterans Employment Programs; Black/African American; American Indian/Alaska Native; Asian; and Native Hawaiian/Other Pacific Islander Programs?		X		
B.4	<b>Compliance Indicator</b>	<b>The agency has committed sufficient budget to support the success of its EEO programs.</b>	<b>Measure has been met</b>		<b>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</b>
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	
B.4.a	Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?		X		
B.4.b	Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program		X		



	and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)			
B.4.c	Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	X		
B.4.d	Is there a central funding or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
B.4.e	Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	X		
B.4.f	Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
B.4.f.1	Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [See 29 CFR 1614.102(b)(5)]	X		
B.4.f.2	Is there sufficient funding to ensure that all employees have access to this training and information?	X		
B.4.g	Is there sufficient funding to provide all managers and supervisors with training and			

	periodic up-dates on their EEO responsibilities:				
B.4.g.1	For ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X			
B.4.g.2	To provide religious accommodations?	X			
B.4.g.3	To provide disability accommodations in accordance with the agency's written procedures?	X			
B.4.g.4	In the EEO discrimination complaint process?	X			
B.4.g.5	To participate in ADR?	X			
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b>					
<b>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.</b>					
C.1	<b>Compliance Indicator</b>	EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area of responsibility.	<b>Measure has been met</b>		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
	<b>Measures</b>		Yes	No	
C.1.a	Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?		X		
C.1.b	Do EEO program officials coordinate the development and implementation of EEO plans with all appropriate agency managers to include Agency Counsel, Human Resources		X		

	Officials, Finance and the Chief Information Officer?				
C.2	<b>Compliance Indicator</b>	The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives.	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
	Measures		Yes	No	
C.2.a	Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?		X		
C.2.b	Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?		X		
C.2.c	Have time-tables or schedules been established for the agency to review its Employee Development /Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?		X		
C.3	<b>Compliance Indicator</b>	When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.	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
	Measures		Yes	No	

C.3.a	Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		
C.3.b	Have all employees, supervisors and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X		
C.3.c	Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?  If so, cite number found to have discriminated and list penalty/disciplinary action for each violation type.	X		There were no findings of discrimination in FY 2017.
C.3.d	Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators and District Court orders?	X		
C.3.e	Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?		X	See Part H – Plan 2 <b>(Updated)</b>

<b>Essential Element D: PROACTIVE PREVENTION</b>					
<b>Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.</b>					
D.1	Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.	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
	Measures		Yes	No	
D.1.a	Do senior managers meet with and assist the EEO Director and/or other EEO program officials in the identification of barriers that may be impeding the realization of equal employment opportunity?		X		
D.1.b	When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?		X		
D.1.c	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?		X		
D.1.d	Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?		X		
D.1.e	Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?		X		

D.1.f	Are trend analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?		X		
D.1.g	Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?		X		
D.1.h	Are trend analyses of the effects of management/personnel policies, procedures, and practices conducted by race, national origin, sex and disability?		X		
D.2	Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.	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
	Measures		Yes	No	
D.2.a	Are all employees encouraged to use ADR?		X		
D.2.b	Is the participation of supervisors and managers in the ADR process required?		X		
<b>Essential Element E: EFFICIENCY</b> <b>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.</b>					
E.1	Compliance Indicator	The agency has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.	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
	Measures		Yes	No	
E.1.a	Does the EEO Office employ personnel with adequate		X		

	training and experience to conduct the analyses required by MD-715 and these instructions?				
E.1.b	Has the agency implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?		X		
E.1.c	Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?		X		
E.1.d	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?		X		
E.1.e	Are 90 percent of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?			X	See Part H – Plan 2 <b>(Updated)</b>
<b>E.2</b>	<b>Compliance Indicator</b>	<b>The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO programs.</b>	<b>Measure has been met</b>		<b>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</b>
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	
E.2.a	Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of		X		

	the agency's complaint resolution process?				
E.2.b	Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?		X		
E.2.c	Does the agency hold contractors accountable for delay in counseling and investigation processing times? If so, briefly describe how:		X		
E.2.d	Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?		X		
E.2.e	Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?		X		
E.3	<b>Compliance Indicator</b>	The agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.	<b>Measure has been met</b>		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
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	



E.3.a	Are benchmarks in place that compare the agency's discrimination complaint processes with 29 CFR Part 1614?	X		
E.3.a.1	Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	X		
E.3.a.2	Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	X		
E.3.a.3	Does the agency complete the investigations within the applicable prescribed time frame?		X	See Part H – Plan 4 <b>(Updated)</b>
E.3.a.4	When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?		X	See Part H – Plan 6 <b>(Updated)</b>
E.3.a.5	When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	X		
E.3.a.6	When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?	X		
E.3.a.7	Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?	X		

E.4	Compliance Indicator	There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of the agency's EEO complaint processing programs.	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
	Measures		Yes	No	
E.4.a	In accordance with 29 CFR 1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?		X		
E.4.b	Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 CFR Part 1614) regulations, with emphasis on the Federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?		X		
E.4.c	After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?		X		
E.4.d	Does the responsible management official directly involved in the dispute have settlement authority?		X		
E.5	Compliance Indicator	The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.	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
	Measures		Yes	No	
E.5.a	Does the agency have a system of management controls in place to ensure the timely, accurate, complete and		X		

	consistent reporting of EEO complaint data to the EEOC?			
E.5.b	Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 CFR §1614.102(a)(1)?		X	
E.5.c	Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received and contains all the required data elements for submitting annual reports to the EEOC?		X	
E.5.d	Do the agency's EEO programs address all of the laws enforced by the EEOC?		X	
E.5.e	Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligation under Title VII and the Rehabilitation Act?		X	
E.5.f	Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?		X	
E.5.g	Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?		X	
<b>E.6</b>	<b>Compliance Indicator</b>	<b>The agency ensures that the investigation and</b>	<b>Measure has been met</b>	<b>For all unmet measures, provide a brief explanation in the space</b>

	<b>Measures</b>	<b>adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.</b>	<b>Yes</b>	<b>No</b>	<b>below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
E.6.a		Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit that handles agency representation in EEO complaints?	X		
E.6.b		Does the agency discrimination complaint process ensure a neutral adjudication function?	X		
E.6.c		If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	X		
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>					
<b>This element requires that Federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>					
F.1	<b>Compliance Indicator</b>	<b>The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.</b>	<b>Measure has been met</b>		<b>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</b>
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	

F.1.a	Does the agency have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?		X		
F.2	<b>Compliance Indicator</b>	<b>The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.</b>	<b>Measure has been met</b>		<b>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</b>
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	
F.2.a	Does the agency have control over the payroll processing function of the agency? If yes, answer the two questions below.		X		
F.2.a.1	Are there steps in place to guarantee responsive, timely and predictable processing of ordered monetary relief?		X		
F.2.a.2	Are procedures in place to promptly process other forms of ordered relief?		X		
F.3	<b>Compliance Indicator</b>	<b>Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.</b>	<b>Measure has been met</b>		<b>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</b>
	<b>Measures</b>		<b>Yes</b>	<b>No</b>	
F.3.a	Is compliance with EEOC orders encompassed in the performance standards of any agency employees?		X		

F.3.a.1	If so, please identify the employee by title in the comments section and state how performance is measured.			<ul style="list-style-type: none"> <li>• HUD Senior Leadership</li> <li>• ODEEO Director</li> <li>• EEO Compliance Officer</li> </ul> <p>The duties and responsibilities of all of the above-mentioned positions are annotated in their annual performance standards and elements.</p>
F.3.b	Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?	X		
F.3.b.1	If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments column.			N/A
F.3.c	Have the involved employees received any formal training in EEO compliance?	X		
F.3.d	Does the agency promptly provide to the EEOC the following documentation for completing compliance?			
F.3.d.1	Attorney Fees: Copy of check issued for attorney fees and/or a narrative statement by an appropriate agency official or agency payment order?	X		
F.3.d.2	Awards: A narrative statement by an appropriate agency official starting the dollar amount and the criteria used to calculate the award?	X		
F.3.d.3	Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an	X		

	appropriate agency official of total monies paid?			
F.3.d.4	Compensatory Damages: The final agency decision and evidence of payment, if made?	X		
F.3.d.5	Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a certain?	X		
F.3.d.6	Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X		
F.3.d.7	Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X		
F.3.d.8	Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).	X		
F.3.d.9	Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X		
F.3.d.10	Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
F.3.d.11	Civil Actions: A complete copy of the civil action complaint	X		

	demonstrating same issues raised as in compliance matter.			
F.3.d.12	Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		



# **PART H**

## **EEO PLAN TO ATTAIN THE ESSENTIAL ELEMENTS OF A MODEL EEO PROGRAM**

**EEOC FORM 715-01**

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2017**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 – Part H, Plan #1 (Updated)**

**Essential Element A:** Demonstrated Commitment from Agency Leadership

**Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.**

<b>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</b>	Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to ensure a workplace that is free from all forms of discrimination, harassment and retaliation?
<b>OBJECTIVE:</b>	In accordance with EEOC Management Directive (MD)-715, its mandated that Federal agencies must have in place an effective anti-harassment program policy and procedures to address non-sexual harassment and establish a separate independent investigatory process and procedures, and failing to provide clear investigation procedures.
<b>RESPONSIBLE OFFICIAL:</b>	Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)
<b>DATE OBJECTIVE INITIATED:</b>	September 30, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2018
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Continue discussions with OASA, ODEEO, AFGE, NFFE, and OGC.	Ongoing

Submit a final policy document to internal stakeholders for final review and concurrence.	June, 2018
Submit agency approved Anti-Harassment Program policies and procedures to EEOC for approval.	August, 2018
Disseminate EEOC Approved Anti-Harassment Program policy and procedures 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.	September 30, 2018
<b>REPORT OF MODIFICATIONS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Modification of the target date has been changed since the initiation of this objective on 09/30/2010.	September 30, 2018
ODEEO has determined that it would be beneficial for the discussions with, OASA, AFGE, NFFE, and OGC to be ongoing throughout the process of establishing the Anti-Harassment Program plan and after the roll-out of the policies and procedures.	Ongoing
Modification of Part H, Plan #1, to provide adjustments to the agency's anti-harassment program based on EEOC's guidance in the technical assistance letter to HUD dated July 6, 2017. Outlining a minimum standard for the agency's anti-harassment program policy and procedures, to be administered with the collaboration of OASA, AFGE, NFFE, and OGC.	September 30, 2018
<b>REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
HUD has recently finalized its Anti-Harassment Program (i.e., policies and procedures), it now undergoes a comprehensive internal agency clearance process which includes the review and concurrence of the HUD Unions (i.e., AFGE, NFFE). The Secretarial anti-harassment policy statement that was issued on July 26, 2017, addresses the deficiencies in the previous HUD policy statement that EEOC identified in the July 6, 2017 Technical Assistance letter to the Department. In addition, the Secretary issued a reminder on the anti-harassment policy statement in November 2017.	April, 2018

<p>Collaborative on-going discussions with the respective stakeholder to ensure full compliance of this mandated policy requirement</p>	<p>Ongoing</p>
<p>In response to the EEOC recommendation for a new, more effective approach to preventing harassment in the workplace, HUD rolled-out its flagship training program, Civil Treatment™ by ELI®. This training has been administered throughout headquarters and field offices to managers and employees, with an emphasis on the process for reporting non-sexual harassment and the separate investigatory process and procedures. HUD continues to conduct annual Ethics and Whistleblower Protection Act training for all employees to promote the highest ethical standards for all employees and cultivate a culture in which HUD program and services can be carried out with the utmost impartiality and integrity. The Whistleblower Protection Act training was centered around ensuring that employees who disclose allegations of serious wrongdoing or gross mismanagement are free from fear of reprisal for their disclosures.</p>	<p>September 30, 2017</p>

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 - Part H, Plan #2 (Updated)**

**Essential Element A:** Demonstrated Commitment from Agency Leadership

**Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.**

**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.**

**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.**

**STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:**

Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodation?

Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?

Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?

**OBJECTIVE:**

Establish a comprehensive Reasonable Accommodation Program (i.e., policies and procedures) and system to track, analyze, and evaluate reasonable accommodation requests of HUD employees, and ensure full compliance in accordance with EEOC guidance "Procedures for Providing Reasonable Accommodation for Individuals With Disabilities", Executive Order 13164 "Requiring Federal Agencies To Establish Procedures To Facilitate the Provision of Reasonable

	Accommodation“, Section 501 of the Rehabilitation Act of 1973, and the ADA Amendments Act of 2008 (ADAAA).
<b>RESPONSIBLE OFFICIAL:</b>	Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)
<b>DATE OBJECTIVE INITIATED:</b>	September 30, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2018
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Discussions with OASA, ODEEO, AFGE, NFFE, and OGC to address the feedback/comments received from EEOC/OFO regarding the agency’s RA policies and procedures EEOC issuance of new regulations concerning the implementation of Section 501 of the Rehabilitation Act of 1973.	Ongoing
Re-route the updated RA Program policies and procedures internally for review/concurrence.	In progress - September, 2017
Provide a follow-up response to the EEOC, Office of Federal Operations (OFO) in accordance with guidance provided in the July 6, 2017 technical assistance letter regarding RA policies and procedures pursuant to the EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation.	Completed - December, 2017
Submit agency approved RA Program policies and procedures to EEOC for final approval.	June 30,2018
In collaboration and support of OSPM to improve the overall processing, managing, and enforcing of the reasonable accommodation process and its tracking system, OASA has decided to revisit its methodology and approach to this functional responsibility.	September 30, 2016
<b>REPORT OF MODIFICATIONS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>

Modification of Part H, Plan #2, to provide a clear and more concise objective in accordance with EEOC issuance of new regulations concerning the implementation of Section 501 of the Rehabilitation Act of 1973 and guidance provided in the July 6, 2017 technical assistance letter regarding RA policies and procedures pursuant to the EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation. In addition, modified the planned objective to reflect the appropriate Essential Element deficiencies.	September 30, 2017
In light of the EEOC issuance of new regulations concerning the implementation of Section 501 of the Rehabilitation Act of 1973, discussions regarding the agency's RA Program policies and procedures with OASA, ODEEO, AFGE, NFFE, and OGC were stalled resulting in delayed collaboration and approval of plans, thus causing this objective's timeline to be modified.	Completed - November 25, 2017
Modification of the target date has been changed since the initiation of this objective on 09/30/2010.	June 30, 2018
Submit agency approved RA Program policies and procedures to EEOC for final approval.	June 2018
<b>REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
HUD-wide RA working group was established at the beginning of FY 2017 to address process improvement measures in making the RA policies and procedures more uniformed, effective, and efficiently throughout the Department. Consultations/meetings were held between OASA, ODEEO, AFGE, NFFE, and OGC to address the feedback/comments received from EEOC/OFO regarding the agency's submitted RA policies and procedures.	October, 2016
HUD has recently finalized the revised updates to its Reasonable Accommodation Program's policies and procedures, which is now undergoing the agency's final internal clearance review and concurrence process before submitting to EEOC for approval.	September 30, 2017
During the FY 2017 HUD EEO and Inclusion in the Workplace Conference, ODEEO welcomed EEOC guest speaker, Dexter Brook, Associate Director of Federal Sector Programs provided an agency update on the new Section 501 of the Rehabilitation Act of 1973 rules and requirements; explaining what federal	

<p>agencies must do to comply with their legal obligation to engage in affirmative action in employment and otherwise serve as "model employers" for individuals with disabilities.</p>	
<p>Reasonable Accommodation FAQ's are disseminated annually to the entire HUD-wide workforce via hud@work.</p>	<p>September 30, 2017</p>
<p>The department's headquarters and field offices have established a great formal working relationship through our partnership with the Computer/Electronic Accommodations Program (CAP) to include providing outreach and technical assistance to field office directors.</p>	<p>September 30, 2017</p>
<p>A RA e-case system has been developed and currently being tested by the HR staff. Testing with program offices is planned for Q4 FY 2017. Deployment of the system for non-bargaining unit employees is planned for Q4 FY 2017. Full deployment of the e-case system is expected in FY 2018 pending union discussions.</p>	<p>July 30, 2018</p>



**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 - Part H, Plan #3 (CLOSED)**

**Essential Element B:** Integration of EEO into the Agency's Strategic Mission

**Requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission.**

<p><b>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</b></p>	<p>Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?</p> <p>Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204</p>
<p><b>OBJECTIVE:</b></p>	<p>Establish an effective full-time equivalent position in support of the Hispanic Employment Program within the Department to identify barriers that may impede the recruitment, hiring, promotion, professional development, and/or retention of Hispanic employees and applicants and advise management officials on the implementation of actions designed to correct the under-representation of Hispanics specific occupational fields and upper grade levels. This HEPM position will interface regularly with local community groups, civil rights advocacy groups, professional organizations, and Hispanic Serving Institutions (HSIs), and serve as a permanent fixture on the agency's Diversity Council.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Director, Office of Departmental Equal Employment Opportunity (ODEEO)</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>September 30, 2016</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2017</p>

<b>PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Recruit and hire a full-time Hispanic Employment Program Manager (HEPM) in the Office of Departmental Equal Employment Opportunity, Affirmative Employment Division (AED), to represent the Department and serve as a principal advisor on all Hispanic related matters involving the recruitment, hiring, promotion, professional development, and retention of Hispanic employees.	September 30, 2017
Post an announcement via internally/externally to recruit for an HEPM.	September 30, 2017
Hire an HEPM within the (AED), to fulfil the mandated requirement of EEOC Management Directive (MD) 110.	September 30, 2017
<b>REPORT OF MODIFICATIONS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
This objective was met through a lateral transfer from another Federal agency.	
<b>REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>In accordance with 29 C.F.R. § 1614.102(b)(4), ODEEO has established a full-time equivalent Diversity Program Manager to serve as the principal advisor in support of the Hispanic Employment Program (HEP) within the Department to identify barriers that may impede the recruitment, hiring, promotion, professional development, and/or retention of Hispanic employees and job applicants, and advise management officials on the implementation of actions designed to correct the under-representation of Hispanics in all mission critical occupations and grade levels.</p> <p>Moreover, ODEEO also has an established full-time equivalent Diversity Program Manager serving as the principal advisor in support of the Federal Women's Program (FWP), as well as an established full-time equivalent Diversity Program Manager serving as the principal advisor in support of the Disability Employment Program (DEP) thus fully complying with EEOC Management Directive (MD) 110, Section VII, Special Emphasis Program. Therefore, this compliance indicator is considered closed.</p>	September 30, 2017

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 – Part H, Plan #4 (Update)**

**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**

<b>STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:</b>	Does the agency complete the investigations within the applicable prescribed time frame? When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?	
<b>OBJECTIVE:</b>	In accordance with 29 CFR 1614 and EEOC Management Directive (MD)-715, its mandated that Federal agencies must have in place an effective EEO complaint processing measure to issue investigations within 180 days and final agency decisions within 60 days of the request.	
<b>RESPONSIBLE OFFICIAL:</b>	Director, Office of Departmental Equal Employment Opportunity (ODEEO)	
<b>DATE OBJECTIVE INITIATED:</b>	September 30, 2017	
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2018	
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>	
Hire additional staff to process cases at conclusion of continuing resolution and government wide hiring freeze	September 30, 2019	
Hire new EEO Division Director and Team Leader	February 5, 2017	
Put new processes in place for processing cases (white board, establish due dates on all assignments)	November 1, 2017	
Holding staff accountable. New elements on performance plans.	February 29, 2017	

<b>REPORT OF MODIFICATIONS TO THE OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<b>REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE</b>	<b>TARGET DATE (MUST BE SPECIFIC)</b>
A new EEO Division Director was hired in February 2017 and a new Team Leader was assigned	February 2017
Put new processes in place for processing cases (white board, establish due dates on all assignments)	March 2017
Holding staff accountable. New elements on performance plans.	February 29, 2017
The processing timeframes for EEO investigations has decreased significantly since the last reporting period. We attribute this positive movement to the establishment of clear internal complaint processing procedures, ongoing team training, revised processing timeframes for our contractors with established penalties for untimely products, and certainly the hard work and commitment of the team. To date, our records show that HUD's average EEO investigation timeframes have been reduced from 420 to 212 calendar days. Based on the aforementioned program enhancements, HUD anticipates a positive report for FY18.	September 30, 2017

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 – Part H, Plan #5 (Update)**

**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

**STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:**

Low resolution rate in ADR process. There is a perception that management is unwilling to settle complaints.

**OBJECTIVE:**

To obtain more ADR resolution and settlements

**RESPONSIBLE  
OFFICIAL:**

Director, Office of Departmental Equal Employment Opportunity (ODEEO)

**DATE OBJECTIVE  
INITIATED:**

September 30, 2017

**TARGET DATE FOR  
COMPLETION OF  
OBJECTIVE:**

September 30, 2019

**PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:**

**TARGET DATE  
(Must be specific)**

Heavily promote ADR

2017-2022

Develop videos utilizing social media platforms

September 30, 2017

**REPORT OF MODIFICATIONS TO THE OBJECTIVE:**

**TARGET DATE  
(Must be specific)**

**REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:**

**TARGET DATE  
(Must be specific)**

In September 2017, ODEEO produced two videos on the benefits of the ADR program. One video was posted on the agencies website to meet their outreach and training objective for the ADR program. Further outreach efforts included ODEEO's participation in the agency's EEO and diversity conference and

September 30, 2017

the Opportunity Exp. In addition, a training initiative is underway to promote the HUD EEO Essentials training series that will include a training module on the ADR program as part of the standard curriculum.

ODEEO is currently preparing standard operating ADR procedures to enhance the efficiency and effectiveness of the program.

**U.S. Department of Housing and Urban Development  
Fiscal Year (FY) 2016**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan to Attain the Essential Elements of a Model EEO Program  
EEOC FORM 715-01 PART H**

**FY 2017 – Part H, Plan #6 (Update)**

**Essential Element E: EFFICIENCY**

Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit that handles agency representation in EEO complaints?

**STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:**

Legal Sufficiency: While the current legal sufficiency review process is not optimal in terms of ensuring an adequate firewall, both ODEEO and OGC are committed to identifying a better solution. Given staffing challenges, the current approach, while not ideal, has at least enabled the EEO office to obtain legal reviews on critical documents. In addition, OGC has taken measures to establish as much of a firewall as possible within the constraints of the current structure and staffing availability. HUD, OGC, and ODEEO leadership are working to establish a Senior Level Attorney Advisor position that will report to the Principal Deputy General Counsel and be dedicated to the needs of ODEEO, including legal sufficiency. Pending approval, the SL position may be advertised and filled during Fiscal Year 2017.

**OBJECTIVE:**

To create the appropriate firewall between OGC legal sufficiency review and litigation.

**RESPONSIBLE  
OFFICIAL:**

Director, Office of Departmental Equal Employment Opportunity (ODEEO); Office of General Counsel (OGC)

**DATE OBJECTIVE  
INITIATED:**

September 30, 2017

**TARGET DATE FOR  
COMPLETION OF  
OBJECTIVE:**

September 30, 2018

**PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:**

**TARGET DATE  
(Must be specific)**

Pending approval and availability of resources , steps are being taken by ODEEO and OGC to establish a Senior Level Attorney

September 30, 2018

<p>Advisor position to be dedicated to ODEEO’s legal sufficiency needs.</p>	
<p><b>REPORT OF MODIFICATIONS TO THE OBJECTIVE:</b></p>	<p><b>TARGET DATE (Must be specific)</b></p>
<p><b>REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:</b></p>	<p><b>TARGET DATE (Must be specific)</b></p>
<p>Legal sufficiency reviews are now conducted by the EEO office with established internal procedures to ensure quality review and adherence to regulatory timeframes. Recent enhancements to the process have resulted in the reduction of FAD processing timeframes.</p>	<p>September 30, 2017</p>



**PART I**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS**

**REPORT - EEO PLAN TO ELIMINATE IDENTIFIED**

**BARRIER(S)**

## PART I

# FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT - EEO PLAN TO ELIMINATE IDENTIFIED BARRIER(S)

EEOC FORM 715-01 PART I	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
U.S. Department of Housing and Urban Development	FY 2016	
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b> Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>HUD's FY 2017 permanent workforce representation of individuals with targeted disabilities was 2.77%, exceeding the federal government-wide goal of 2% of the Agency's workforce. This was a .08% increase from FY 2016 at 2.69%.</p> <p>In addition, HUD's total workforce representation of individuals with disabilities was 10%, a .22% increase from the previous fiscal year. Although HUD has not quite reached the federal government-wide set goal of 12% for Federal agency workforces, there is a steady increase, and with continued focus on recruitment and retention, HUD feels confident that in FY 2018 we will meet the goal of 12%.</p>	
<p><b>BARRIER ANALYSIS:</b> Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>Reviewed existing workforce data, along with specialized data that was captured for MD- 715. Data show individuals with targeted disabilities are underrepresented compared to the federal goal of 2%. There continues to be a lack of awareness on the part of hiring managers of the special hiring authorities that could be used to non-competitively hire individuals with targeted disabilities and of established organizations whose mission is to assist Federal agencies in finding qualified candidates with disabilities.</p>	
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b> Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Reeducate hiring managers and human capital professionals on the special hiring authorities and conduct specialized recruitment and outreach efforts to increase the number of new hires with disabilities and targeted disabilities.</p>	
<p><b>OBJECTIVE:</b> State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Continue to improve recruitment, outreach, and hiring efforts of individuals with disabilities and targeted disabilities.</p>	
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA);</p>	

	Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)
<b>DATE OBJECTIVE INITIATED:</b>	October 1, 2016 (newly modified from FY 2015)
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	On-going
Establish HUD's five-year goals/plans to increase the participation rates of individuals with disabilities (12%) and targeted disabilities (2%) to reach the government-wide goal and set new goals as deemed necessary.	Completed
Provide training to managers/supervisors on Schedule A Hiring Authorities.	September 30, 2018
Promote the participation in all HUD-wide related activities aimed at increasing the participation of individuals with disabilities.	September 30, 2018
Use OPM's contract vendor and other resources to recruit and hire qualified individuals with disabilities and targeted disabilities.	September 30, 2018
Make a proposal to HUD Program Offices on the need to develop a supplemental five-year plan for increasing and improving the hiring, recruitment, and retention of individuals with disabilities as required by Executive Order 13548 using OPM guidance issued in November 2010. All plans should be geared to the commitment of 2% for all new hires over the next five-years in support of individuals with targeted disabilities.	September 30, 2018
Plan to reaffirm its commitment to resurvey its workforce every two years and will do so during FY 2017 to update the race, ethnicity, gender, veteran, and disability codes identified in supporting workforce statistical information. This survey will be conducted through a voluntary self-identification process for the purpose of assisting in the development of affirmative and diversity and inclusion plans to address and eliminate potential barriers to recruitment/outreach, hiring, professional development, promotion, and retention of individuals with disabilities (including targeted disabilities).	September 30, 2018
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b>	
<p>HUD's current workforce is comprised of 2.88% for PWTD and 10% for PWD, both meeting the Federal Government-wide goal.</p> <p>Throughout the year and through HUD Learn, managers/supervisors and employees are provided a series of courses designed to enlighten their understanding and awareness on the benefits of being well versed with disability related matters and resources. In addition, Treasury Executive Institute (TEI) provides a forum for HUD's managers/supervisors and senior executives to learn and grow by exposing them to the best leadership models, new technologies, and best practices in addressing government-wide initiatives such as "Increasing Federal Employment of Individuals with Disabilities".</p>	

HUD provides easy access in requesting “assistive technology” through its Assistive Technology Program (ATP) for accommodating HUD employees who have visual, hearing, mobility, cognitive, or other impairments. As HUD program offices and/or managers encounter individuals in need of “assistive technology”, they may follow the policy and procedures that have been prominently displayed on the hud@work intranet site at <http://hudatwork.hud.gov/HUD/cio/po/i/it/usersupp/enabled/>.

In addition, “Interpreter Services”, a program under the Reasonable Accommodation Branch, Employee Assistance Program Health and Wellness Division, OASA, is a contracted program to provide sign language/oral interpreting services to HUD employees who are deaf or hard of hearing. All request for sign language interpreting services of HUD sponsored meetings or events are typically submitted by the respective Program Office’s Administrative Officer (AO), Program Manager, Supervisors and/or Employee to Interpreter Services at [InterpreterServices@hud.gov](mailto:InterpreterServices@hud.gov) and/or by contacting (202) 708-0738.

Through a collaborative effort, HUD reaffirmed its commitment to the reenactment of Section 508 of the Rehabilitation Act by reestablishing the roles, responsibilities, and clearinghouse in providing access to and the use of electronic and information technology (EIT) by individuals with disabilities. In addition, HUD consulted with the U.S. Access Board to focus on how HUD’s facilities can be made more accessible to individuals with disabilities. Note: The U.S. Access Board is responsible for the enforcement of accessibility standards issued under the Architectural Barriers Act, which has required that federal facilities be accessible to individuals with disabilities. <http://hudatwork.hud.gov/HUD/cio/po/i/508/index>

HUD, in its partnering agreement with Computer/Electronic Accommodations Program (CAP), constantly receives invitations of their engaging presentations/assessments being conducted throughout the country and often shared with the HUD headquarter and field office staff members.

HUD promotes the use of the Job Accommodation Network (JAN) as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and job applicants for employment.

<b>EEOC FORM 715-01 PART I</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
U.S. Department of Housing and Urban Development	FY 2016	
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>There continues to be a low participation rate of Hispanics (Latinos) in mission critical occupations (i.e., Economist Series (0110); Human Resources Management Series (0201); Miscellaneous Administration and Program Series (0301); Equal Opportunity Compliance Series (0360); Auditing Series (0511); General Business and Industry Series (1101); Contracting Series (1102); and Information Technology Management Series (2210).</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>A review of workforce data tables revealed that HUD is experiencing lower than expected Hispanics (Latinos) participation rates in several of the mission critical occupations. HUD employed 630 (8.14%) permanent Hispanic employees in its workforce, which is slightly below the government-wide participation rate of 8.5% and significantly below the civilian labor force (CLF) participation rate of 9.96%. In addition, the participation rate for the permanent Hispanics workforce decreased by 12 employees from 642 (8.08%) in FY 2016 to 630 (8.14%) in FY 2017.</p>	
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>HUD has not fully established its targeted recruitment/outreach plan to tap into underutilized, diverse talent pools, and those aligned to our mission critical occupations and anticipated skills gaps.</p> <p>Reeducate hiring managers and Human Capital professionals on the importance of securing a high performing workforce that's drawn from all segments of society.</p>	
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Formalize organizational recruitment and succession planning strategies to increase targeted recruitment and outreach efforts for all Hispanics (Latinos) and in mission critical related occupations. In addition, identify</p>	

	<p>specific goals to achieve HUD's diversity and inclusion, and engagement vision; conduct an organizational assessment, using multiple measures, which will provide baseline research to assist HUD in better understanding the organizational climate, and to be used to further strategic diversity management goals; and provide policy recommendations to the Secretary, Deputy Secretary, and Principal Staff as well as an annual report documenting the progress of any established strategic planning efforts.</p>
<b>RESPONSIBLE OFFICIAL:</b>	<p>Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)</p>
<b>DATE OBJECTIVE INITIATED:</b>	<p>October 1, 2016 (newly modified from FY 2015)</p>
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	<p>On-going</p>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<p>TARGET DATE (Must be specific)</p>
<p>Per EEOC Management Directive (MD) 110 dated August 5, 2015, "the head of the agency shall designate an Equal Employment Opportunity Officer(s) and such Special Emphasis Program Managers (i.e., Hispanic Employment Program Manager) to carry out the functions described in Part 1614 in all organizational units of the agency and at all agency installations. 29 C.F.R. § 1614.102(b)(4)". For this purpose, the HEPM would participate in and monitor the coordination and compliance of EEO guidelines and principles affecting Hispanics (Latinos) and the various reporting requirements associated with this group.</p>	<p>September 30, 2018 (completed October 30, 2017)</p>

<p>Establish partnerships with colleges, universities, alumni groups, professional organizations, and all other groups for targeting a diverse pool of candidates.</p>	<p>September 30, 2018</p>
<p>Utilize HUD’s Diversity Council and specifically the “Latino Network” and “HUD National Image Chapter” (two vital affinity groups) to assist with the Department’s efforts and serve as a “change agent” to promote an inclusive work environment that furthers HUD’s vision for diversity.</p>	<p>September 30, 2018</p>

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

HUD continues to have a much better framework for establishing special projects and initiatives derived from efforts currently underway to address the under-representation and under-utilization of Hispanics in the workplace thus offering a more cohesive and comprehensive plan in resolving these disparities.

HUD hired a total of 397 permanent employees in FY 2017 of which 21 (5.28%) represented the permanent new hires of Hispanic employees and is lower than the government-wide Hispanic new hires rate of 7.5% in FY 2016. Lastly, of the 632 total separations of HUD permanent employees, 43 (6.8%) were that of permanent Hispanic employees thus resulting in a much higher rate compared to the Hispanic new hires rate of 5.28% during the same reporting period.

Under HUD’s Diversity Council and specifically in support of all Hispanic (Latino) employees, the “Latino Network” and “HUD National Image Chapter” serve as two vital affinity groups (i.e., employee resource groups) assisting senior leadership in developing and maintaining an effective workforce by 1) serving as a change agent to promote an inclusive work environment that furthers HUD’s vision for diversity; 2) identifying specific goals to achieve HUD’s diversity and inclusion, and engagement vision; 3) conducting an organizational assessment, using multiple measures, which will provide baseline research to assist HUD in better understanding the organizational climate, and to be used to further strategic diversity management goals; and 4) providing policy recommendations to the Secretary, Deputy Secretary, and Principal Senior Staff as well as an annual report documenting the progress of strategic planning efforts.

In support of HUD’s Strategic Plan, 2014 – 2018, Human Capital Strategic Plan (HCSP) for 2015 – 2018, Human Capital Succession Planning for 2015-2018, and Strategic Workforce Planning for 2015-2018, here’s just a few noteworthy accomplishments in achieving operational excellence of its human capital management objectives:

HUD’s Office of Departmental Equal Employment Opportunity (ODEEO) sponsored a government-wide EEO & Diversity in the Workplace Conference entitled “Building an Inclusive Workplace Together” in which members from HUD’s employee resource groups: Robert C. Weaver Chapter of Blacks In Government (BIG); Widening Opportunities for Women (W.O.W.) Chapter of Federally Employed Women (FEW); AAPI Group; HUD LGBTQ group, FEDQ; HUD

chapter of Image, Inc.; Latino Network; Advocates for HUD Employees with Disabilities (AHED); and, Veterans Affinity Group (VAG), came together, under the leadership of ODEEO, to present an interactive training conference which covered a variety of topics of interest to include Microinequities/Micro-triggers, Panel Discussion from HUD Leadership, Harassment in the Workplace, Affirmative Action for People with Disabilities in Federal Employment, and other thought-provoking presentations. In addition, this training conference also provided participants with an opportunity in obtaining informative and productive resources that could support their professional and organizational development and network with colleagues representing a variety of interests who are from diverse organizations and experiences.

HUD's Office of Departmental Equal Employment Opportunity (ODEEO) through its webpage and in partnership with HUD's National Image Chapter and the Latino Network invited the entire Department to join in celebrating National Hispanic Heritage Month 2017 by honoring and reflecting on Hispanic and Latino American's vitality and meaningful legacy in our Nation's cultural framework. This year's theme entitled "Shaping the Bright Future of America", embodies the ideal that Hispanic and Latino Americans shape the bright future of America through their contributions to all aspects of America's daily life and national endeavors. Whether it be defending our Nation or exploring the universe, conducting scientific research and studies or providing services, in the law or in the arts, in community leadership, finance, sports, or in any other activity, Hispanic and Latino Americans enrich the fabric of America to make it brighter, more just and stronger.

HUD employees fully supported and participated by attending the National Image Conference 2017 in Albuquerque, NM, where several HUD employees serve as their National Officers.

Continued efforts from FY 2016

- The Latino Network established a Share Point site that is available upon becoming a member along with a "Yammer" (internal social media) site for connecting and keeping open communication with its members and the HUD workforce. The Latino Network continues to provide notices for job opportunities, free training and leadership articles through their Yammer site referenced as "Conexiones" and seeks to transform high-potential, mid-career Latino professionals into innovative executives by sharing developmental information, training opportunities and job/vacancy announcements.
- HUD continues to have a much better framework for establishing special projects and initiatives derived from efforts currently underway to address the under-representation and under-utilization of Hispanics in the workplace thus offering a more cohesive and comprehensive plan in resolving these disparities.



<b>EEOC FORM 715-01 PART I</b>	<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
U.S. Department of Housing and Urban Development	FY 2016	
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>HUD’s non-compliance in establishing and maintaining an effective Reasonable Accommodation Program that complies with the governing laws and principles set forth in Section 501 of the Rehabilitation Act of 1973, Americans with Disabilities Act (ADA) of 1990, Executive Order 13163 “Establishing Procedures to Facilitate the Provision of Reasonable Accommodation”, Americans with Disabilities Act Amendment Act of 2008, and other related statutes and Executive Orders which requires Federal agencies to establish procedures to facilitate the provisions of reasonable accommodations.</p> <p>Further, HUD received a notice of deficiency in this area from EEOC in a technical assistance letter dated July 6, 2017.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In conducting an analysis of Part G (Agency’s Self-Assessment Checklist Measuring Essential Elements), along with noting that the Department still doesn’t have an approved RA process and procedures by EEOC, HUD has, therefore, failed to implement sound procedures for reasonable accommodation for individuals with disabilities and targeted disabilities that have been made readily available/accessible to all employees and applicants for employment.</p>	
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>HUD has failed to train employees and managers/supervisors on their responsibilities under the Department’s process and procedures for reasonable accommodation.</p> <p>In addition, HUD lacks an RA web-based tracking system that manages/monitors the reasonable accommodation process, disabilities/targeted disabilities, accommodation approved/disapproved, and resources of assistance.</p>	

<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Finalize the HUD's Reasonable Accommodation Policies and Procedures incorporating feedback from EEOC and formalize communications which outline the responsibilities of all parties involved in this process.</p> <p>Comply with the EEOC updated regulations concerning implementation of Section 501 of the Rehabilitation Act of 1973 by January 3, 2018.</p> <p>In addition, provide training to all employees and managers/supervisor on the RA process, and disseminate such procedures during new employee orientations, periodic employee and manager/supervisor training sessions, as well as making these RA procedures available via HUD's hud@work (Intranet Website) and www.hud.gov (External Website).</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>October 1, 2016 (newly modified from FY 2015)</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>January 2018</p>
<p><b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b></p>	<p>TARGET DATE (Must be specific)</p>
<p>Per EEOC Management Directive (MD) 110, sufficiently staff a Disability Employment Program Manager (DEPM) to administer, manage/monitor, and enforce the provisions governing the Department's Reasonable</p>	<p>September 30, 2017</p> <p>Beginning in FY 2018, in accordance with 29 C.F.R. § 1614.102(b)(4), ODEEO now has established a full-time equivalent Diversity Program Manager to serve as the principal advisor in support</p>

<p>Accommodation Program in accordance with Section 501 of the Rehabilitation Act of 1973, Americans with Disabilities Act (ADA) of 1990, Executive Order 13163 “Establishing Procedures to Facilitate the Provision of Reasonable Accommodation”, Americans with Disabilities Act Amendment Act of 2008, and other related statutes and Executive Orders which requires Federal agencies to establish procedures to facilitate the provisions of reasonable accommodations.</p>	<p>of the Disability Employment Program (DEPM) within the Department to identify barriers that may impede the recruitment, hiring, promotion, professional development, and/or retention of employees and job applicants, and advise management officials on the implementation of actions designed to correct the under-representation of PWD and PWTD in all mission critical occupations and grade levels.</p>
<p>Collaborate with HUD’s Diversity Council and specifically “Advocates for HUD Employees with Disabilities (AHED)” to assist with the Department’s efforts and serve as a “change agent” to promote an inclusive work environment that furthers HUD's vision for diversity.</p>	<p>September 30, 2017 Completed and Ongoing</p>
<p>Develop a more comprehensive RA process that complies with the statutory, regulatory, Executive Orders, and other related policies governing Federal agencies by EEOC.</p>	<p>January 2018</p>
<p>Conduct an assessment of all approved/disapproved RA request to determine what trends, commonalities, and/or barriers exist for immediate process improvements.</p>	<p>September 30, 2018</p>

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

- Since the last reporting (FY 2016) HUD received a notice of deficiency in this area from EEOC in a technical assistance letter dated July 6, 2017, noting that HUD had not revised our revised reasonable accommodation procedures, per EEOC feedback.
- EEOC has issued new regulations concerning the implementation of Section 501 of the Rehabilitation Act of 1973, therefore, HUD has additional work to do in the area of compliance to those revisions.
- Drafted new Reasonable Accommodation Program policies and procedures, per EEOC feedback, for review/concurrence and submission to the Equal Employment Opportunity Commission (EEOC) for final agency approval. (Still in departmental coordination and union negotiation at the time of reporting.)

- Established a workgroup to address the feedback/comments received from EEOC/OFO regarding the agency's submitted RA policies and procedures and to address process improvement measures in making the RA procedures more uniform, effective and efficient.
- Provided a follow-up response to the technical assistance letter from the EEOC, Office of Federal Operations (OFO), dated July 6, 2017, regarding HUD's RA policies and procedures pursuant to the EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation.
- Working on the specifications for the Development of a Reasonable Accommodation Case Management System to track and monitor all request for reasonable accommodation for status updates and reporting, and determine commonalities for expedient and proactive processing.

## **PART J**

# **SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES**

# **SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, AND ADVANCEMENT OF INDIVIDUALS WITH TARGETED DISABILITIES**

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

To capture agencies' affirmative action plan for persons with disabilities (PWDs) and persons with targeted disabilities (PWTDs), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### **SECTION I: EFFORTS TO REACH REGULATORY GOALS**

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

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

- a. Cluster GS-1 to GS-10 (PWDs)      Yes    **No**
- b. Cluster GS-11 to SES (PWDs)      **Yes**    No

**Response:** HUD's permanent PWDs employees on cluster GS-11 to SES is currently at 9.51% or 684 employees, which falls slightly less than the Federal goal of 12% by 2.49%.

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

- a. Cluster GS-1 to GS-10 (PWTDs)      Yes    **No**
- b. Cluster GS-11 to SES (PWTDs)      Yes    **No**

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

**Response:** Through the dissemination of HUD's Annual Management Directive (MD) 715 Report and the "State of EEO Briefing" with the Secretary/Deputy Secretary by the Office of Departmental Equal Employment Opportunity (ODEEO), along with on-going briefings by the Office of Diversity and Inclusion (ODI) to HUD's Program Offices on their respective numerical hiring and attrition goals for PWDs and PWTDs, HUD continues to promote recruitment and

hiring strategies in seeking to increase the employment of persons with disabilities by developing mandatory training programs. In addition, HUD will establish its 5-year plan for increasing and improving the hiring, recruitment, and retention of PWDs and PWTDs.

## 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 PWDs and PWTDs, 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. **Yes No**

**Response:** In accordance with 29 C.F.R. § 1614.102(b)(4), ODEEO has a full-time equivalent Diversity Program Manager serving as the principal advisor in support of the administration and management of the HUD-wide Disability Employment Program (DEP) by providing leadership, guidance, direction, training, and coordination of the program. In addition, several staff in the Office of the Assistant Secretary for Administration, the Office of the Chief Information Officer, and the Office of General Counsel are responsible for advancing the employment of people with disabilities and ensuring accessibility at the Department.

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 PWDs and PWTDs	1	0	0	<b><i>Lisa E. Swinney,</i></b> <b><i>Selective Placement</i></b> <b><i>Coordinator,</i></b> <b><i>Recruitment and</i></b> <b><i>Staffing Division, OASA</i></b> <a href="mailto:recruitment@hud.gov">recruitment@hud.gov</a>

Answering questions from the public about hiring authorities that take disability into account	1	0	0	<i>Lisa E. Swinney,</i> <i>Selective Placement Coordinator,</i> <i>Recruitment and Staffing Division, OASA</i> <a href="mailto:recruitment@hud.gov">recruitment@hud.gov</a>
Processing reasonable accommodation requests from applicants and employees	4	0	0	<i>Jackie P. Cumber,</i> <i>Branch Chief,</i> <i>Reasonable Accommodation Branch,</i> <i>OASA</i> <a href="mailto:jackie.p.cumber@hud.gov">jackie.p.cumber@hud.gov</a>
Section 508 Compliance	0	1	40	<i>Jeffrey Salit,</i> <i>Section 508 Coordinator,</i> <i>OCIO</i> <a href="mailto:jeffrey.l.salit@hud.gov">jeffrey.l.salit@hud.gov</a>
Architectural Barriers Act Compliance	0	0	9	<i>Jeanine M. Worden,</i> <i>ABA Coordinator, OGC</i> <a href="mailto:jeanine.m.worden@hud.gov">jeanine.m.worden@hud.gov</a>
Special Emphasis Program for PWDs and PWTDs	1	0	0	<i>Eric M. Gima,</i> <i>Diversity Program Manager, Affirmative Employment Division,</i> <i>ODEEO</i> <a href="mailto:eric.m.gima@hud.gov">eric.m.gima@hud.gov</a>

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

**Response:** Throughout the year and through the Office of Departmental Equal Employment Opportunity and HUD Learn disability program staff have participated in a variety trainings and courses designed to enhance their knowledge and understanding on disability related matters and concerns. Staff have participated in such training conferences as EEOC’s EXCEL, Federal



Dispute Resolution Conference, HUD's annual EEO and Diversity Conference, and Civil Treatment Training. Additionally, the OASA Human Resources Business Partners (HRBP) who directly advise hiring managers on recruitment strategies will be taking additional training to further their knowledge on disability employment opportunities. These training courses will commence in Quarter 3 of FY 2018 and include topics such as Hiring, Retaining and Including People with Disabilities, Selective Placement Program Coordinator training and Veteran Employment Training.

## **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. **Yes No**

**Response:** HUD's Office of Departmental Equal Employment Opportunity (ODEEO) has designated a full-time equivalent Diversity Program Manager to serve as the principal advisor in support of all Disability Employment Program matters in providing leadership, guidance, and direction to members and/or volunteers of the program. In addition, HUD's Office of the Assistant Secretary for Administration, Office of the Chief Information Officer, and the Office of General Counsel have designated staff to advance the employment of people with disabilities at the Department and ensure accessibility.

## **SECTION III: PROGRAM DEFICIENCIES IN THE DISABILITY PROGRAM**

FEDSEP will provide the program deficiencies from the current Part G. We highlighted the Part G questions in green. In the chart below, please list the highlighted Part G questions with "No" answers and provide the agencies' comments, if any. If there are no program deficiencies, please state "The agency has not reported any program deficiencies involving the disability program.")

### **Program Deficiencies:**

- Have managers and supervisors been trained on their responsibilities under the procedures for reasonable accommodation?
- Do the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?
- Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?

**Response:** HUD provided virtual and in-person management training on reasonable accommodation along with providing an updated video on the agency's internal website entitled, "Overview of Reasonable Accommodation for Managers" which was led by an Assistant General Counsel representative from the EEOC. In addition, reasonable

accommodation FAQs and supplemental trainings and videos are provided through HUD Learn to the entire agency workforce.

HUD does review the quality of the reasonable accommodation decisions/actions to ensure compliance with our internal goals and objectives for the life-cycle of the reasonable accommodation in relation to quality, scope, timeliness, and accuracy. Further, HUD's reasonable accommodation timeliness is a component of OASA's HRStat process. In the HRStat data-driven review process, OASA leadership intends to regularly evaluate reasonable accommodation process weaknesses, strengths, areas for improvement and develop interventions for improvement.

### **Objectives:**

- Establish a comprehensive Reasonable Accommodation Program (i.e., policies and procedures) and system to track, analyze, and evaluate reasonable accommodation requests of HUD employees, and ensure full compliance in accordance with EEOC guidance "Procedures for Providing Reasonable Accommodation for Individuals With Disabilities", Executive Order 13164 "Requiring Federal Agencies To Establish Procedures To Facilitate the Provision of Reasonable Accommodation", Section 501 of the Rehabilitation Act of 1973, and the ADA Amendments Act of 2008 (ADAAA).

### **Accomplishments:**

- HUD recently completed revisions to the Reasonable Accommodation Program's policies and procedures. The revised procedures are now in the Department's internal clearance process. The updated procedures may also need to go through bargaining with the Department's unions. While these processes were not all completed by January 3, 2018; the Department has taken steps to ensure Personal Assistant Services are available to employees with disabilities who have such a need and the Department has developed and will timely implement our affirmative employment plan for people with targeted disabilities. In addition, the Department is working diligently to ensure that applicants and employees with disabilities promptly receive reasonable accommodations. HUD will keep EEOC closely apprised of updates and developments with respect to the updated reasonable accommodation procedures and will submit them to EEOC for approval prior to implementation. HUD's Office of the Assistant Secretary for Administration anticipates that the process for finalizing the updated reasonable accommodation procedures will be completed by the end of the fourth quarter of Fiscal Year 2018. This date is dependent upon successful union negotiations.

## **SECTION IV: PLAN TO RECRUIT AND HIRE INDIVIDUALS WITH DISABILITIES**

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

## 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:** HUD promotes the participation of all HUD-wide related activities aimed at increasing the participation of PWDs and PWTs with disabilities by utilizing OPM's contract vendor (Bender Consulting) and other resources (State Vocational Rehabilitation Centers) to recruit and hire qualified individuals with disabilities and targeted disabilities. In addition, HUD also utilizes the Department of Labor's (DOL) Workforce Recruitment Program (WRP) which connects federal and private sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to prove their abilities in the workplace through job employment.

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 PWDs and PWTs for positions in the permanent workforce.

**Response:** HUD's Selective Placement Coordinator reviews the respective Program Office's Position Organizational Listing (POL) for potential vacancies and future positions and subsequently forwards all qualified Schedule A applicants to the Program Offices' Administrative Officers for their immediate review and consideration.

Additionally, to further operationalize the recruitment of PWDs or PWTs, the HRBP will review our internal repository of eligible applicants and forward to the hiring manager for consideration prior to any vacancy being advertised.

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:** HUD's Selective Placement Coordinator verifies the appropriate proof of disability supporting documentation issued by licensed medical professionals, vocational rehabilitation specialist or any Federal, state, or agency of the District of Columbia or a US territory that has the authority determine the eligibility. Applicants are forwarded for consideration utilizing multiple methods. First being the SPPC conducting a proactive review of an Organization's Position Organizational Listing (POL) to identify the organization's anticipated positions and then provide potential applicants to the Administrative Officer. Secondly, prior to any vacancy announcement being posted, the HRBP will review the internal repository of eligible applicants for the respective vacancy and forward to the hiring manager for consideration. And lastly, a Program Office always has to opportunity to initiate a request of applications to review through the SPPC or the HRBP. Selecting officials receive quarterly training on how the authority can be used, and they're given an additional overview when they're reviewing an applicant for consideration using the Schedule A authority.

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. **Yes No**

**Response:** HUD’s Selective Placement Coordinator provides quarterly training to all program hiring managers and administrative officers (AO) on all qualified hiring authorities and practices available with the goal of increasing HUD’s usage of the Schedule A hiring authority and Veterans recruitment programs. This training is normally provided in person at headquarters and virtually for the field. In addition, representatives from HUD’s Recruitment and Staffing Division participates in multiple recruitment fairs throughout the year at colleges/universities and military institutes conducting mini interviews reviewing and providing insight on resume structure. OASA’s HRBPs also provides guidance and advisory services on other hiring initiatives for recruitment of PWTDS through additional resources such as Pathways and Peace Corp programs. Resumes are received via email to a central email box within the Recruitment and Staffing Division and maintained in a central repository to be forwarded for upcoming vacancies.

## **B. Plan To Establish Contacts With Disability Employment Organizations**

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWDs, including PWTDS, in securing and maintaining employment.

**Response:** HUD utilizes OPM’s contract vendor (Bender Consulting), DOL’s Workforce Recruitment Program (WRP), and other resources to recruit and hire PWDs and PWTDS. In addition, HUD through its Selective Placement Program Coordinator (SPPC), recently established partnerships with the Division of Vocational Rehabilitative Services and the Department for the Blind and Vision Impaired to promote future hiring opportunities for persons with disabilities and targeted disabilities.

## **C. Progression Towards Goals (Recruitment and Hiring)**

1. Using the goals of 12% for PWDS and 2% for PWTDS as the benchmarks, do triggers exist for PWDs and/or PWTDS among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
  - a. New Hires for Permanent Workforce (PWDs)      **Yes No**
  - b. New Hires for Permanent Workforce (PWTDS)      **Yes No**
  
2. Using the qualified applicant pool as the benchmark, do triggers exist for PWDs and/or PWTDS among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
  - a. New Hires for MCO (PWDs) **Yes No**

- b. New Hires for MCO (PWTDS)      **Yes**    **No**

**Response:** HUD reviewed existing workforce data along with specialized data that is traditionally captured for MD- 715 and determined that a more conscious effort is needed for improving our recruitment, outreach, hiring, and retention of persons with disabilities and targeted disabilities. Although we've made significant progress, we'll be conducting extensive research and workforce analyses to determine further trends/gaps in our workforce regarding our mission critical occupations (MCOs). However, HUD through its Selective Placement Program Coordinator (SPPC), recently established partnerships with the Division of Vocational Rehabilitative Services and the Department for the Blind and Vision Impaired to promote future hiring opportunities for persons with disabilities and targeted disabilities.

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

- a. Qualified Applicants for MCO (PWDs)      **Yes**    **No**

- b. Qualified Applicants for MCO (PWTDS)      **Yes**    **No**

**Response:** HUD collected well over 100,000 job applications where over 9,100 PWDs/PWTDS candidates applied for positions through USA Jobs with 76 being hired through the competitive procedures. HUD's current workforce is comprised of 2.76% for PWTDS and 10.21% for PWD'S (Workforce Analytics Data Source), both meeting the Federal Government-wide goal.

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

- a. Promotions for MCO (PWDs)      **Yes**    **No**

- b. Promotions for MCO (PWTDS)      **Yes**    **No**

## **SECTION V: PLAN TO ENSURE ADVANCEMENT OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES**

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



a. Applicants (PWTDS) Yes No

b. Selections (PWTDS) Yes No

### C. Awards

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWDS and/or PWTDS 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 (PWTDS) Yes No

b. Awards, Bonuses, & Incentives (PWTDS) Yes No

**Response:** In FY 2017, the agency identified a trigger involving the percentage of PWDS for time-off awards over 9 hours and bonuses over \$500.00. Additionally, the agency identified a trigger involving the percentage of PWTDS for time-off awards over 9 hours.

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

a. Pay Increases (PWTDS) Yes No

b. Pay Increases (PWTDS) Yes No

**Response:** In FY 2017, the agency identified triggers involving the percentages of PWDS (8.85%) relating to quality step increases or performance-based pay increases.

3. If the agency has other types of employee recognition programs, are PWDS and/or PWTDS 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 (PWTDS) Yes No

b. Other Types of Recognition (PWTDS) Yes No

### D. Promotions

1. Does your agency have a trigger involving PWDS 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 (PWDs)      Yes    **No**
  - ii. Internal Selections (PWDs)                **Yes**    No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWDs)      **Yes**    No
  - ii. Internal Selections (PWDs)                **Yes**    No
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWDs)      **Yes**    No
  - ii. Internal Selections (PWDs)                **Yes**    No
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWDs)      Yes      No
  - ii. Internal Selections (PWDs)                Yes      No

**Response:** In FY 2017, the percentage of PWDs among the qualified internal applicants for grade GS-13 (3.30%), GS-14 (3.33%) and GS-15 (0.00%) fell below the benchmark. In FY 2017, the percentage of PWDs among the selectees for promotion at grades GS-13 (1.85%), GS-14 (0.00%) and GS-15 (0.00%) fell below the benchmark.

2. Does your agency have a trigger involving PWTDS 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 (PWTDS)      Yes    **No**
  - ii. Internal Selections (PWTDS)                Yes    **No**
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTDS)      **Yes**    No
  - ii. Internal Selections (PWTDS)                **Yes**    No



c. Grade GS-14

i. Qualified Internal Applicants (PWTDS)      **Yes**    No

ii. Internal Selections (PWTDS)              **Yes**    No

d. Grade GS-13

i. Qualified Internal Applicants (PWTDS)      **Yes**    No

ii. Internal Selections (PWTDS)              **Yes**    No

**Response:** In FY 2017, the percentage of PWTDS among the qualified internal applicants for grade GS-13 (1.10%), GS-14 (1.90%) and GS-15 (0.00%) fell below the benchmark.

In FY 2017, the percentage of PWTDS among the selectees for promotion at grades GS-13 (0.00%), GS-14 (0.00%) and GS-15 (0.00%) fell below the benchmark.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWDs 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 (PWDs) **Yes**    No

b. New Hires to GS-15 (PWDs)      **Yes**    No

c. New Hires to GS-14 (PWDs)      **Yes**    No

d. New Hires to GS-13 (PWDs)      **Yes**    No

**Response:** While the agency’s overall permanent new hires for FY 2017 resulted in 15.62% for PWDs, we suspect there could be potential triggers for the various grade levels.

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

b. New Hires to GS-15 (PWTDS)      Yes    No

c. New Hires to GS-14 (PWTDS)      Yes    No

d. New Hires to GS-13 (PWTDS)      Yes    No

**Response:** While the agency’s overall permanent new hires for FY 2017 resulted in 2.77% for PWTDs, we suspect there could be potential triggers for the various grade levels.

5. Does your agency have a trigger involving PWDs 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 (PWDs)      **Yes**    No
- ii. Internal Selections (PWDs)                **Yes**    No

b. Managers

- i. Qualified Internal Applicants (PWDs)      **Yes**    No
- ii. Internal Selections (PWDs)                **Yes**    No

c. Supervisors

- i. Qualified Internal Applicants (PWDs)      **Yes**    No
- ii. Internal Selections (PWDs)                **Yes**    No

**Response:** In FY2017, the agency found that triggers exist for PWDs among applicants and selectees for new hires to supervisors, managers and executive positions.

6. Does your agency have a trigger involving PWTDs 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 (PWTDs)      **Yes**    No
- ii. Internal Selections (PWTDs)                **Yes**    No

b. Managers

- i. Qualified Internal Applicants (PWTDs)      **Yes**    No
- ii. Internal Selections (PWTDs)                **Yes**    No

c. Supervisors

- i. Qualified Internal Applicants (PWTDs)      **Yes**    No

- ii. Internal Selections (PWTDS)                      **Yes**    **No**

**Response:** In FY2017, the agency found that triggers exist for PWTDS among applicants and selectees for new hires to supervisors, managers and executive positions.

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

- a. New Hires for Executives (PWDs)                      **Yes**    **No**
- b. New Hires for Managers (PWDs)                      **Yes**    **No**
- c. New Hires for Supervisors (PWDs)                      **Yes**    **No**

**Response:** In FY2017, the agency found that triggers exist for PWDs among selectees for new hires to supervisors, managers and executive positions.

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

- a. New Hires for Executives (PWTDS)                      **Yes**    **No**
- b. New Hires for Managers (PWTDS)                      **Yes**    **No**
- c. New Hires for Supervisors (PWTDS)                      **Yes**    **No**

**Response:** In FY2017, the agency found that triggers exist for PWTDS among selectees for new hires to supervisors, managers and executive positions

**SECTION VI: PLAN TO IMPROVE RETENTION OF PERSONS WITH DISABILITIES**

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

## A. Voluntary and Involuntary Separations

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

**Response:** HUD is transitioning all transactional work regarding special employment programs (e.g., Schedule A) to a Shared Service Provider (SSP) effective 2<sup>nd</sup> Quarter of Fiscal Year 2018. At that time, the SSP will monitor all conversion dates and send reminder notices to managers and Administrative Officer’s at a minimum of 90 days prior to their conversion eligibility date.

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

a. Voluntary Separations (PWDs) **Yes** **No**

b. Involuntary Separations (PWDs) **Yes** **No**

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

a. Voluntary Separations (PWTDS) **Yes** **No**

b. Involuntary Separations (PWTDS) **Yes** **No**

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

## 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:** On January 19, 2017, HUD implemented an agency-wide Policy on Section 508 of the Rehabilitation Act and Accessible Technology. The Policy identifies employee and applicant rights under Section 508, including a description of how to file a complaint at Section 9 (and which office will handle the complaint). The Policy is available at <https://www.hud.gov/sites/dfiles/OCIO/documents/s508022217.pdf>

In addition, HUD provides additional information on its public-facing website regarding where complaints can be filed by linking to other agency websites, such as the Access Board and the General Services Administration:

[https://www.hud.gov/program\\_offices/cio/Section\\_508\\_At\\_HUD](https://www.hud.gov/program_offices/cio/Section_508_At_HUD)

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:** HUD provides a link to the Access Board's website, which provides information on how to file an Architectural Barriers Act complaint:

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/FHLaws](https://www.hud.gov/program_offices/fair_housing_equal_opp/FHLaws)

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 is continually engaged in several education and outreach endeavors aimed at improving accessibility of its facilities and technology, pursuant to our compliance requirements under Section 508 and other federal accessibility requirements, such as: (1) publication of an agency-wide Section 508 Policy, identification of office responsibilities, and continuation of a variety of training opportunities following HUD's inaugural Accessibility Awareness Day in 2017, (2) the review of electronic and information technology in Departmental Clearance and a variety of programs and applications to increase compliance with Section 508, (3) establishment of a Section 508 Compliance and Investment Committee with representatives from all major offices and which reports to the Deputy Secretary and HUD leadership; and (4) increased engagement with our vendors (software and equipment) to increase compliance.

## **C. Reasonable Accommodation Program**

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

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

**Response:** HUD's average time frame for processing Department-wide initial requests for reasonable accommodations during this reporting period was approximately 56 days.

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

**Response:** HUD provided virtual and in-person management training on reasonable accommodation along with providing an updated video on the agency's internal website entitled, "Overview of Reasonable Accommodation for Managers" which was led by an Assistant General Counsel representative from the EEOC. In addition, reasonable accommodation FAQs and supplemental trainings and videos are provided through HUD Learn to the entire agency workforce.

HUD does review the quality of the reasonable accommodation decisions/actions to ensure compliance with our internal goals and objectives for the life-cycle of the reasonable accommodation in relation to quality, scope, timeliness, and accuracy. Further, HUD's reasonable accommodation timeliness is a component of OASA's HRStat. In the HRStat data-driven review process, OASA leadership intends to regularly evaluate reasonable accommodation process weaknesses, strengths, areas for improvement, and develop interventions for improvement.

#### **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 requests for trends.

**Response:** HUD has updated its Reasonable Accommodation Program policy and procedures to include the implementation of EEOC's Personal Assistance Services (PAS) requirement. Request for PAS will follow the same process as outlined in HUD Handbook 7855.1, "Accommodation Request for Persons with Disabilities." The procedures that the process for requesting PAS, the process for determining whether such services are required, and the agency's right to deny such requests when provision of the services would pose an undue hardship, are the same as for reasonable accommodation.

Moreover, the revised procedures are now in the Department's internal clearance process. The updated procedures may also need to go through bargaining with the Department's unions. While these processes were not completed by January 3, 2018, the Department has taken steps to ensure that Personal Assistant Services (PAS) will be made available to employees with disabilities who have such a need and the Department has developed and will timely implement our affirmative employment plan for people with targeted disabilities. In addition, the Department is working diligently to ensure that applicants and employees with disabilities

promptly receive reasonable accommodations. HUD will keep EEOC closely apprised of updates and developments with respect to the updated reasonable accommodation procedures and will submit them to EEOC for approval prior to implementation. HUD's Office of the Assistant Secretary for Administration anticipates that the process for finalizing the updated reasonable accommodation procedures will be completed by the end of the fourth quarter of Fiscal Year 2018. This date is dependent upon successful union negotiations.

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

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

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

**Yes** (20/83 = 24% HARASSMENT BASED ON DISABILITY)    **No**

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?

**Yes**    **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: N/A**

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

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

**Yes** (15/83 = 18%)    **No**

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

**Yes**    **No**

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

**Response: N/A**

## SECTION VIII: 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 PWDs and/or PWTDS?

**Yes**    **No**

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

**Yes**    **No**

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: Reasonable Accommodation Program**

**Barrier(s):** EEO Model Program Essential Element Deficiency

### **Objective(s):**

Establish a comprehensive Reasonable Accommodation Program (i.e., policies and procedures) and system to track, analyze, and evaluate reasonable accommodation requests of HUD employees, and ensure full compliance in accordance with EEOC guidance “Procedures for Providing Reasonable Accommodation for Individuals With Disabilities”, Executive Order 13164 “Requiring Federal Agencies To Establish Procedures To Facilitate the Provision of Reasonable Accommodation“, Section 501 of the Rehabilitation Act of 1973, and the ADA Amendments Act of 2008 (ADAAA).

### **Responsible Official(s):**

Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)

**Performance Standards Address the Plan? (Yes or No): Yes**

**Target Date (mm/dd/yyyy):** 09/30/2014

### **Planned Activities:**



- Re-establish discussions with OASA, ODEEO, AFGE, NFFE, and OGC.
- Draft new Reasonable Accommodation Program policies and procedures for review/concurrence and submit to the Equal Employment Opportunity Commission (EEOC) for final agency approval.
- Provide a follow-up response to the EEOC, Office of Federal Operations (OFO) based on the feedback HUD received regarding its submitted RA policies and procedures pursuant to the EEOC Policy Guidance on Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation.
- Consultations meetings held between OASA, ODEEO, AFGE, NFFE, and OGC to address the feedback/comments received from EEOC/OFO regarding the agency's submitted RA policies and procedures.
- In collaboration and support of OSPM to improve the overall processing, managing, and enforcing of the reasonable accommodation process and its tracking system, OASA has decided to revisit its methodology and approach to this functional responsibility.
- Reasonable Accommodation Project Kick-Off meeting was scheduled, and all respective stakeholders were invited to participate in this process improvement methodology of the RA process by which ongoing meetings are continuously held.
- HUD-wide RA working group was established at the beginning of FY 2017 to address process improvement measures in making the RA policies and procedures more uniformed, effective, and efficiently throughout the Department. The RA Working Group meets weekly in hopes of resubmitting its final RA Program policies and procedures to EEOC/OFO asap.
- In the interim, Reasonable Accommodation FAQ's were developed and disseminated to the entire HUD-wide workforce via Hud@work along with presenting a webinar to educate employees on the reasonable accommodation process.

**Sufficient Staffing & Funding? (Yes or No): No**

**Modified Date (mm/dd/yyyy): 09/30/2018**

**Completion Date (mm/dd/yyyy): TBD**

**Fiscal Year: 2017**

**Accomplishments:**

- Completed HUD's Reasonable Accommodation Program policies and procedures and submitted to the EEOC for final agency approval.

- Consultations meetings held between OASA, ODEEO, AFGE, NFFE, and OGC to address the feedback/comments received from EEOC/OFO regarding the agency's submitted RA policies and procedures.
- Invested in modeling the Toyota Production System (TPS) Process Improvement Methodology to assist in making the agency's Reasonable Accommodation Program policies and procedures more efficient and effective (i.e., customer friendly to all HUD employees).
- A RA e-case system has been developed and currently being tested by the HR staff. Testing with program offices is targeted for Q4 FY 2018. Deployment of the system for non-bargaining unit employees is targeted for Q1 FY 2019. Full deployment of the e-case system is targeted for FY 2019 pending union discussions.
- Established a HUD-wide working group to assist with implementing new RA Program policies and procedures and finalize the agency's policy for resubmission to EEOC/OFO.
- HUD recently completed revisions to its Reasonable Accommodation Program's policies and procedure, and is now in the Department's internal clearance process.
- HUD is taking steps to ensure that Personal Assistant Services (PAS) is available to employees with disabilities who have such a need and the Department has developed and will timely implement our affirmative employment plan for people with targeted disabilities.
- HUD will be working diligently to further improve its processing times and ensure that applicants and employees with disabilities promptly receive reasonable accommodations.
- HUD anticipates that the process for finalizing the updated reasonable accommodation procedures will be completed by the end of the first quarter of Calendar Year 2018.

**Trigger 1:** HUD's workforce representation for persons with disabilities (PWD'S) appears to be slightly under the overall federal government-wide goal of 12% resulting in 10.21% for PWD'S.

**Barrier(s):**

Reviewed existing workforce data, along with specialized data that was captured for MD- 715. Data now shows that persons with disabilities (PWDs) are slightly below the federal goal of 12% (HUD's representation of PWTDS is 2.76% which is above the goal of 2%).

**Objective(s):**

Improve recruitment, outreach, and hiring efforts of individuals with disabilities and targeted disabilities.

**Responsible Official(s):**

Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); American Federation of Government Employees (AFGE); National Federation of Federal Employees (NFFE), and the Office of General Counsel (OGC)

**Performance Standards Address the Plan? (Yes or No): Yes**

**Target Date (mm/dd/yyyy): 09/30/2015**

**Planned Activities:**

**Sufficient Staffing & Funding? (Yes or No): Yes**

**Modified Date (mm/dd/yyyy): 10/01/16**

**Completion Date (mm/dd/yyyy): On-going**

**Fiscal Year: 2018**

**Accomplishments:**

- Throughout the year and through the Office of Departmental Equal Employment Opportunity and HUD Learn, managers/supervisors and employees are provided a series of courses designed to enlighten their understanding and awareness on the benefits of being well versed with disability related matters and resources. In addition, Treasury Executive Institute (TEI) provides a forum for HUD’s managers/supervisors and senior executives to learn and grow by exposing them to the best leadership models, new technologies, and best practices in addressing government-wide initiatives such as “Increasing Federal Employment of Individuals with Disabilities”.
- HUD provides easy access in requesting “assistive technology” through its Assistive Technology Program (ATP) for accommodating HUD employees who have visual, hearing, mobility, cognitive, or other impairments. As HUD program offices and/or managers encounter individuals in need of “assistive technology”, they may follow the policy and procedures that have been prominently displayed on the Hud@work intranet site at <http://hudatwork.hud.gov/HUD/cio/po/i/it/usersupp/enabled/>.
- In addition, “Interpreter Services”, a program under the Reasonable Accommodation Branch, Employee Assistance Program Health and Wellness Division, OASA, is a contracted program to provide sign language/oral interpreting services to HUD employees who are deaf or hard of hearing. All request for sign language interpreting services of HUD sponsored meetings or events are typically submitted by the respective Program Office’s Administrative Officer (AO), Program Manager, Supervisors and/or

Employee to Interpreter Services at [InterpreterServices@hud.gov](mailto:InterpreterServices@hud.gov) and/or by contacting (202) 708-0738.

- Through a collaborative effort, HUD reaffirmed its commitment to the reenactment of Section 508 of the Rehabilitation Act by reestablishing the roles, responsibilities, and clearinghouse in providing access to and the use of electronic and information technology (EIT) by individuals with disabilities. In addition, HUD consulted with the U.S. Access Board to focus on how HUD's facilities can be made more accessible to individuals with disabilities. Note: The U.S. Access Board is responsible for the enforcement of accessibility standards issued under the Architectural Barriers Act, which has required that federal facilities be accessible to individuals with disabilities.  
<http://hudatwork.hud.gov/HUD/cio/po/i/508/index>
- HUD, in its partnering agreement with Computer/Electronic Accommodations Program (CAP), constantly receives invitations of their engaging presentations/assessments being conducted throughout the country and often shared with the HUD headquarter and field office staff members.
- HUD promotes the use of the Job Accommodation Network (JAN) as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and job applicants for employment.
- HUD's Office of the Assistant Secretary for Administration (OASA), Office of Human Capital Services, Recruitment and Staffing Division (RSD), participated in 10 recruitment events providing information on the Schedule A and Veterans program to attract well-qualified candidates. RSD partnered with the Department of Transportation (DOT), to provide a cross-hiring event for Persons with Disabilities (PWD'S), hosting hiring tables and providing information on current and future positions within the Department. SEP informed potential candidates about the Department's mission and job opportunities, conducted mini interviews, and provided their resumes to prospective hiring managers.
- HUD's Office of Departmental Equal Employment Opportunity (ODEEO) has designated a full-time equivalent Diversity Program Manager to serve as the principal advisor in support of all Disability Employment Program matters in providing leadership, guidance, and direction to members and/or volunteers of the program.
- Throughout the year and through the Office of Departmental Equal Employment Opportunity and HUD Learn, HUD managers/supervisors and employees are provided a series of courses designed to enlighten their understanding and awareness on the benefits of being well versed with disability related matters and resources (i.e., Civil Treatment Training; Exceptional Leadership Training; and National Training Programs). In addition, Treasury Executive Institute (TEI) provides a forum for HUD's managers/supervisors and senior executives to learn and grow by exposing them to the best leadership models, new technologies, and best practices in addressing government-wide initiatives such as "Increasing Federal Employment of Individuals with Disabilities".

- HUD's Selective Placement Coordinator provides quarterly training to all program hiring managers and administrative officers (AO) on all qualified hiring authorities and practices available with the goal of increasing HUD's usage of the Schedule A hiring authority and Veterans recruitment programs. This training is provided in person and virtually for field managers. In addition, representatives from HUD's Recruitment and Staffing Division participates in multiple recruitment fairs throughout the year at colleges/universities and military institutes conducting mini interviews reviewing and providing insight on resume structure. OASA's HRBPs also provides guidance and advisory services on other hiring initiatives for recruitment of PWTD'S through additional resources such as Pathways and Peace Corp programs. Resumes are received via email to a central email box within the Recruitment and Staffing Division and maintained in a central repository to be forwarded for upcoming vacancies.
- In FY 2017, HUD collected well over 100,000 job applications where over 9,100 PWDs/PWTDs candidates applied for positions through USA Jobs with 76 being hired through the competitive procedures. HUD's current workforce is comprised of 2.76% for PWTD'S and 10.21% for PWD'S, both meeting the Federal Government-wide goal.

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

**Response:** HUD's ODEEO and OASA will continue its longstanding partnership and collaboration in providing a fresher perspective for administering and managing the agency's disability requirements (i.e. Affirmative Action Plans).

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

**Response:** While there's so much more to be done, the agency will continue to be committed with improving the recruitment, hiring, professional development, and retention of PWDs and PWTDs.