



FY 2018

ANNUAL EEOC MANAGEMENT DIRECTIVE (MD) 715 REPORT



U.S. Equal Employment Opportunity Commission (EEOC)

Management Directive (MD) 715 provides policy guidance and standards for establishing and maintaining an effective affirmative program of equal employment opportunity pursuant to Title VII of the Civil Rights Act of 1964 and Section 501 of the Rehabilitation Act of 1973.

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As the Director of the Office of Departmental Equal Employment Opportunity for the U.S. Department of Housing and Urban Development, it is my honor to present *HUD's Annual EEOC MD 715 Report for Fiscal Year 2018*. This report summarizes the Department's efforts in maintaining an effective affirmative program of equal employment opportunity (EEO) and addresses its goals in developing and implementing a more comprehensive, integrated, and strategic focus on EEO, diversity, and inclusion.

As outlined in this report, HUD has strengthened its EEO program by publishing updated policies and guidance and improved timeliness and continues to resolve deficiencies previously identified by the EEOC. In the future, this report will serve as a reminder of our goals and reinforce the standards for complying with Federal EEO laws, regulations, and directives.

The Office of Departmental Equal Employment Opportunity and the Office of the Chief Human Capital Officer, Office of the Assistant Secretary for Administration, work collaboratively to support inclusive diversity and engagement through increasingly innovative policies, programs, and initiatives.

I am grateful and appreciative to our colleagues and partners for recognizing that HUD's strength comes from the dedication, experience, talents, and perspectives of every employee. Through our ongoing efforts to promote EEO and diversity within HUD, we will maintain an effective and inclusive work environment and enhance mission readiness.

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

SECTION I
THE MODEL EEO PROGRAM
PARTS A – D

PART A - Department or Agency Identifying Information

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

PART B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Non-Appropriated Workforce	Total Workforce
Number of Employees	7,373	105	N/A	7478

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	Brian Montgomery (A)	Deputy Secretary, U.S. Department of Housing and Urban Development
Principal EEO Director/Official Title/Series/Grade	John P. Benison john.p.benison@hud.gov	Director, Office of Departmental Equal Employment Opportunity, ES-0260-00, (202) 708-3362
Title VII Affirmative EEO Program Official	Stephen D. Smith stephen.d.smith@hud.gov	Director, Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-2734
Section 501 Affirmative Action Program Official	P. Victoria Williams p.victoria.williams@hud.gov	Director, EAP, Health and Wellness Division, Office of Chief Human Capital Officer, Office of the Assistant Secretary for Administration, GS-0201-15, (202) 4023495
Complaint Processing Program Manager	Tami L. Wright tami.l.wright@hud.gov	Director, Equal Employment Opportunity Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-6818
ADR Program Manager	Tami L. Wright tami.l.wright@hud.gov	Director, Equal Employment Opportunity Division, Office of Departmental Equal Employment Opportunity, GS-0260-15, (202) 402-6818

Agency Leadership	Name	Title
Principle MD-715 Preparer	Patrice L. Wilson patrice.l.wilson@hud.gov	Diversity Program Manager (HEPM), Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-13, (202) 402-6502
Other Responsible EEO Staff	Tonya P. Watson tonya.p.watson@hud.gov	Diversity Program Manager (FWPM), Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-13, (202) 402-3595
	Eric M. Gima eric.m.gima@hud.gov	Diversity Program Manager (DEPM), Affirmative Employment Division, Office of Departmental Equal Employment Opportunity, GS-0260-13, (678) 732-2490

PART D - List of Subordinate Components Covered in This Report

Subordinate Component	City	State	CPDF Code (xxxx)	FIPS Code

EEOC Forms and Documents Included with this Report

Have the following forms and/or documents been uploaded?	(Please respond "Yes" or "No")	Comments
*Executive Summary (Part E)	Yes	
*Statement of Establishment of Continuing Equal Employment Opportunity Programs (Part F)	Yes	
*Optional Annual Self-Assessment Checklist Against Essential Elements (Part G)	Yes	
*EEO Plan to Attain the Essential Elements of a Model EEO Program (Part H)	Yes	
*EEO Plan to Eliminate Identified Barriers (Part I)	Yes	
*Section 501 Affirmative Action Plan - Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities (Part J)	Yes	

Have the following forms and/or documents been uploaded?	(Please respond "Yes" or "No")	Comments
Appendices		
*Organizational Charts	Yes	
*Delegation of Authority	Yes	
*Copies of relevant EEO/D&I 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	
Social Media and HUD Connect Policies and Procedures Handbook	Yes	
*Analysis of EEOC 462 Report	Yes	
*Agency's Strategic Plan 2018-2022	Yes	
*Agency's Human Capital Operating Plan 2018-2022	Yes	
*Agency's Strategic Workforce Plan 2018-2022	Yes	
*Agency's Human Capital Succession Plan 2018-2022	Yes	
*Agency's Departmental Corporate Learning Plan 2018	Yes	
*Agency's Employee Engagement Strategy and Action Plan 2018	Yes	
*Agency's Inclusive Diversity Strategic Plan 2017-2021	Yes	
*FEORP Report	Yes	
*Federal Employee Viewpoint Survey (FEVS)	Yes	
*Glossary of Terms & Acronyms	Yes	
*Copies of Workforce Data Tables	Yes	

PART E

EXECUTIVE SUMMARY

HUD is a cabinet-level Department that employs approximately 7,400 employees in its Headquarters (HQ) and 10 regional offices. HUD's employees support the Department by providing a wide array of programs and services, including community planning and development, housing counseling for the homeless, single and multifamily mortgage insurance, public housing, and protecting children from the hazards of lead paint. Other HUD 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. 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's current focus is to Rethink American Communities by allowing for more homegrown solutions and greater community participation in solving complex housing problems and identifying local regulatory barriers that stifle the development of affordable housing and working with local partners to remove them. Additionally, HUD is building partnerships and collaborating with philanthropic and faith-based organizations to align community-based supportive services, such as job training, that can put residents on a path to independence. Finally, HUD is focusing on streamlining the administration of the Department's rental assistance programs to give public housing authorities and other state and local partners more control to find unique ways to address housing needs.

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 reaffirmed his ongoing commitment to the principles of EEO, and diversity and inclusion by issuing the annual [EEO Policy Statement](#), [Alternative Dispute Resolution \(ADR\) Policy Statement](#), and [Anti-Harassment Policy Statement](#) on July 19, 2018, illustrating his dedication to supporting EEO and strategic diversity management principles. The policy statements were disseminated to all HUD employees via global email, Internet, and intranet sites.

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.

- HUD regularly engages senior leaders on the importance of creating an inclusive and diverse workforce by motivating and effectively communicating with employees. As a result, senior leaders are learning to effectively utilize tools and eliminate barriers to enhance their support for this initiative. In 2018, HUD deployed a human capital dashboard for managers and supervisors that includes diversity data. Additionally, HUD continues to develop and implement broad

recruitment and outreach strategies, to attract diverse new talent at all levels of the Department, that are consistent with merit system principles.

- HUD's efforts are further strengthened through leadership participation and collaboration with Employee Resource Groups (ERGs), Affinity Groups, the Diversity Council, and other diversity and inclusion events. The HUD Diversity Council identifies workplace issues and makes recommendations to support the recruitment, outreach, hiring, professional development, and retention of HUD employees. HUD leaders participate in the HUD Diversity Council, providing direct support and guidance to ERGs and Affinity Groups.
- HUD reviews and analyzes the Federal Employee Viewpoint Survey (FEVS) to understand and respond to employees' perceptions of the workplace, as identified by the U.S. Office of Personnel Management's New Inclusion Quotient (IQ) responses. Among other things, FY 2018 FEVS results demonstrate that 80 % of the HUD workforce believe they work in a unit where individuals have the job related knowledge, skills and abilities to accomplish organizational goals, ultimately resulting in increased engagement and workplace satisfaction.
- HUD conducted an annual [Ethics and Whistleblower Protection Act Training](#) to promote the highest ethical standards for employees and cultivate a culture in which HUD programs and services are always carried out impartially and with integrity. The training consisted of interactive scenarios, centered around issues related to employee standards of conduct, financial disclosures, and the criminal conflicts of interest under Federal law, and covered legal opinions on travel, the Hatch Act, gift acceptance, post-Government employment restrictions, and HUD's Reform Act. Further, the Whistleblower Protection Act Training focused on ensuring that employees who disclose allegations of serious wrongdoing or gross mismanagement are free from fear of reprisal.

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.

- HUD increased the use of data analytics, including the deployment of a dashboard, to demonstrate historical hiring trends, develop strategies to improve hiring times, and support sound position management and organizational design.
- HUD reestablished the Field Quality Management Review (FQMR) and conducted four pilot reviews. FQMRs are critical leadership tools for enhancing the performance of HUD's regional and field offices and promoting cross-office collaboration. The FQMR provides HUD senior managers with an early warning mechanism to identify operational problems before they reach a critical stage and a platform for recognizing exemplary ways of accomplishing the Department's mission.

- HUD hosted the Federal Coaching Conference on July 24–25, 2018, titled *Coaching ...Where Excellence Has Wings*. This event, open to HUD coaches, employees, and external Federal coaches, provided tools to enhance coaching engagements, educated participants on the benefits of coaching, and demonstrated how it could promote winning strategies to move individuals, teams, and organizations forward. Special workshops were also reserved for senior executives, managers, and Federal coaches to explore coaching competencies and action planning tools for successful coaching relationships.
- HUD maintains a mentoring program that provides developmental opportunities, builds cross-cultural understanding, and cultivates greater inclusion and engagement for all employees. HUD’s Mentoring Program is one year and open to all HUD employees. Its objective is to improve performance at all levels of the workforce, provide real-time assistance in problem solving, and increase job satisfaction and retention.
- HUD conducted its 4th Annual EEO and Diversity in the Workplace Conference, titled *Our Differences Make Us Stronger*. As part of the conference, HUD partnered with the National Council of Hispanic Employment Program Managers (NCHEPM) to host two Leadership Speed Mentoring discussions. The Leadership Speed Mentoring Discussions provided an opportunity for direct interactions with senior executives and experienced managers regarding senior executive service (SES) competencies, leadership performance expectations, and maximizing career opportunities to enhance leadership skills.
- HUD hosted a New IQ Master Game-Changer Training Course to improve teamwork, retention, innovation, and productivity throughout HUD, and focused on the knowledge and practical implementation strategies of executing the New IQ program to show a return on investment for diversity and inclusion.

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.

- HUD LEARN enables the delivery of integrated learner-centric programs and services in support of HUD’s mission by collaborating, cultivating, and consulting. HUD LEARN offers training programs and courses, on a continuous basis, to the HUD workforce, covering a variety of topics and skill developments. For 2018, HUD LEARN offered well over 220 workshops and trainings to HUD employees.

- HUD has seven established ERGs that offer employees an opportunity to network, address common issues and concerns, and develop recommendations and solutions from those with similar backgrounds, experiences, or interests. During HUD's 4th Annual EEO and Diversity in the Workplace Conference, ERG's presented interactive training workshops on a variety of topics, including Emotional Intelligence; Authentic Leadership; LBGTQ 101; Transitioning from Military to the Civilian Workforce; Show Up Great: A Blueprint For Success Personally and Professionally; Understanding, Harnessing, and Leveraging the Power of the Unconscious Mind; and Action Discussion: Addressing Generational Differences.
- HUD's 4th Annual EEO and Diversity in the Workplace Conference also included plenary sessions focused on Creating a Culture of Civility in your Workplace and First Generation Professionals (FGPs): Designed to Unlock and Unleash FGPs Full Potential and Understanding and Working with Generational Differences. In addition, the conference provided resources to support participants' professional and organizational development and an opportunity to network with colleagues. Importantly, the conference featured keynote addresses from Secretary Carson, as well as the Director of Civil Rights for the U.S. Department of Agriculture, and private sector diversity and inclusion community members.
- HUD facilitated several sessions of its flagship training program *Civility Matters* to the HUD Workforce at Headquarters and in the field. The training promotes positive workplace behaviors and provides participants with the tools to prevent inappropriate workplace behaviors and understand their responsibility to maintain a civil workplace. HUD conducted a total of nine *Civility Matters* trainings in FY 2018, with a satisfaction rate of 91.5 %.
- In support of HUD's Special Emphasis Programs and Diversity and Inclusion Initiatives, special commemorative observances and activities were conducted to create an inclusive workplace with enhanced engagement. HUD collaboratively hosted numerous events featuring guest speakers who provided a wealth of experiences and insights into how we can be more intentionally inclusive and engaging of special emphasis populations. These events were very well attended, both in person and virtually.
- HUD hosted a successful on-the-spot hiring job fair to recruit qualified GS-7 through GS-15 candidates for its program offices. Veterans, Peace Corps and Vista, and other special hiring authority eligible applicants visited HUD program office tables to obtain information and learn about the various HUD programs. The hiring event reached more than 660 attendees and on-site interviews were conducted, resulting in over 27 selections and in seven final job offers, to date.

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 has a zero-tolerance standard for discrimination, harassment, and civil rights violations and continues to be vigilant in taking prompt and appropriate steps to address all such allegations.
- HUD implemented the Reasonable Accommodation Portal to monitor, track, and report on the reasonable accommodations process. HUD's Reasonable Accommodation Portal is an automated recordkeeping system that provides secure storage of reasonable accommodation request information, supporting documentation, decisions and justifications for decisions, appeals, and implementation. It will allow for increased accountability across the Department for timely and appropriate responses to reasonable accommodations requests.
- HUD managers and supervisors are required to 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, and mutually agreeable manner.
- HUD significantly decreased processing time frames for EEO investigations and Final Agency Decisions (FADs) since the last reporting period. HUD attributes this positive movement to the establishment of clear internal complaint processing procedures and ongoing team training. HUD's 462 Report demonstrates that HUD's average EEO investigation time frames were reduced from 421 days in FY 2017 to 246 days in FY 2018. Additionally, FAD processing time frames decreased significantly from 217 days in FY 2017 to 43 days in FY 2018.
- HUD prominently displays EEO complaint posters, brochures, and other related reference materials throughout its Headquarters and field installations, as well as on the Hud@work intranet site outlining the process and its time frames.

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

- HUD continues to comply with all statutes, regulations, Executive orders, policies, and procedures governing Federal sector EEO and diversity and inclusion.
- HUD posts all required No FEAR Act information on its Hud@work intranet website, as well as the Department's external website, and requires all new HUD employees to take the required No FEAR Act training within 30 days of appointment. HUD employees consistently participate in semiannual No FEAR Act training. No FEAR Act reports are timely filed, as prescribed by Congress, the Office of Management and Budget, the U.S. Office of Personnel Management, and the EEOC.
- HUD ensures that an EEO and Diversity module is included as mandatory training to all employees annually.

- On August 20, 2018, HUD conducted a State of the Agency Briefing for the Secretary, Deputy Secretary, and other senior leaders, focused on maintaining a high performing and robust departmental model EEO program. This briefing also provided a forum to discuss internal and external factors that could be impeding HUD's mission, as well as strategies to address, mitigate, and eliminate such workplace barriers.
- HUD continues to disseminate its MD-715 report to the Secretary, Deputy Secretary, all senior leaders, and the Diversity Council.

PART F

CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

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

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

am the

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

Principal EEO
Director/Official
for

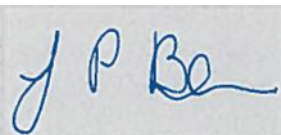
U.S. Department of Housing and Urban Development (HUD)

(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 workforce 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.

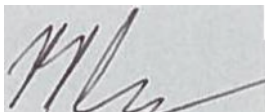


John P. Benison, Director
Office of Departmental Equal Employment Opportunity
U.S. Department of Housing and Urban Development

4/25/19

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Date



Benjamin S. Carson Sr., Secretary
U.S. Department of Housing and Urban Development

5-29-19

Signature of Agency Head or Agency Head Designee

Date

PART G

AGENCY SELF-ASSESSMENT CHECKLIST MEASURING ESSENTIAL ELEMENTS

EEOC FORM 715-01

Fiscal Year (FY) 2018

EEOC FORM 715-01 REPORT PART G					U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS				
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.				
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		<p>The Agency Head was installed on March 2, 2017, and initially issued EEO policy statement in July 2017.</p> <p>An updated EEO policy statement, ADR policy statement, and Anti-Harassment policy statement were issued by the Agency Head on July 19, 2018.</p>				
A.1.b	During current Agency Head's tenure, has EEO policy statement been reissued 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 outreach 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 See Part H – Plan #1 (Updated)
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 accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	X	
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	<p>In accordance with the agency’s “Table of Offenses and Penalties Guide”, this provides a framework for managers/supervisors to use in taking the appropriate constructive and rehabilitative discipline action to address workplace behaviors and attitudinal inappropriateness and consistently ensuring the penalty in relation to the charge has been properly applied.</p> <p>In addition, and as set forth in the “EEOC Select Task Force on the Study of Harassment in the Workplace”, the agency has invested in implementing a workplace civility and bystander intervention training as a part of its holistic harassment prevention training program to aid in reducing/eliminating the level of harassment in the HUD workplace. Civility Matters to the HUD Workforce.</p>

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

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.

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	Compliance Indicator	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 the status of EEO programs and are involved in, and consulted on, management/personnel actions.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
			Yes	No	
B.2.a	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		X		

	eliminated or reduced the impact of?			
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		
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	Measure has been met	For all unmet measures, provide a brief

	Measures	human resources and budget allocations to its EEO programs to ensure successful operation.	Yes	No	explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report.
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 - Title 5 CFR, Subpart B, 720.204?		X		
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;		X		

Title 5 U.S.C. Subpart B,
Chapter 31, Subchapter I-
3102: 5 CFR 213.3102(u);
5 CFR 315.709?

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

**Compliance
Indicator**

**The agency has
committed sufficient
budget to support the
success 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

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
and ADR, and to make a
request for reasonable
accommodation? (Including

X

	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

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY

This element requires the Agency Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the agency's EEO program and plan.

C.1	Compliance Indicator	EEO program officials advise and provide	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	appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area of responsibility.	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		X		

		Agency Counsel, Human Resources Officials, Finance and the Chief Information Officer?			
C.2	Compliance Indicator	The Human Resources Director and the EEO Director	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	meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives.	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	Compliance Indicator	When findings of discrimination are made, the agency	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	explores whether or not disciplinary actions should be taken.	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	<p>Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?</p> <p>If so, cite number found to have discriminated and list penalty/disciplinary action for each violation type.</p>	X	<p>There was one findings of discrimination in FY 2018. Under the section for corrective action/relief, the Order calls for (a) 4 hours of training to any management official involved; (b) the agency shall consider taking appropriate disciplinary action against responsible management officials; (c) \$35,765.40 attorney fees; (d) \$2,953.85 costs.</p>
C.3.d	Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor	X	

arbitrators and District Court orders?

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
(Updated)

Essential Element D: PROACTIVE PREVENTION Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.					
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		X		

		distribution conducted by race, national origin, sex and disability?			
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		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	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.	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		

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.					
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 training and experience to conduct the analyses required by MD-715 and these instructions?		X		
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 % of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?			X	See Part H – Plan #2 (Updated)

E.2	Compliance Indicator	The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's 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.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 the agency's complaint resolution process?		X		
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		X		

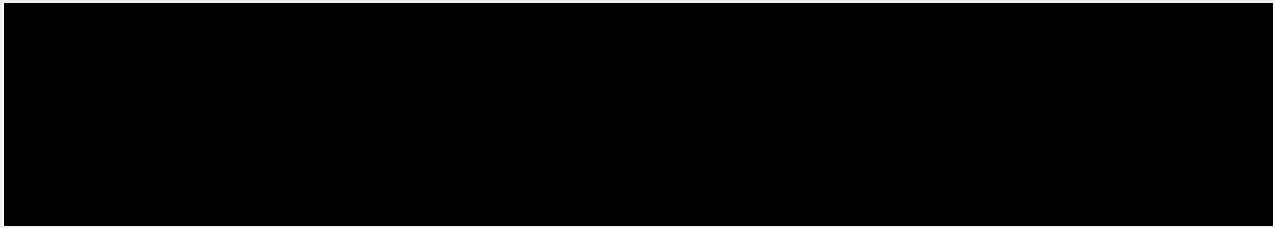
collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?

E.3	Compliance Indicator	Measures	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.		Measure has been met	
			Yes	No	Yes	No
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 #3 (Updated)
E.3.a.4	When a complainant requests a final agency decision, does the agency issue the decision		X			See Part H – Plan #3 (Updated)

		within 60 days of the request?			
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	X		

	resolution of disputes and the benefits associated with utilizing ADR?			
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		See Part H – Plan #4 (Updated)
E.4.d	Does the responsible management official directly involved in the dispute have settlement authority?	X		
E.5	Compliance Indicator	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	
	The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.			
E.5.a	Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	X		
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			
E.6	Compliance Indicator	Measure has been met			
	Measures	Yes	No	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	
	The agency ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.				
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	See Part H – Plan #5 (Updated)	
E.6.b	Does the agency discrimination complaint process ensure a neutral adjudication function?	X			



Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE					
This element requires that Federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.					
F.1	Compliance Indicator	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.	Measure has been met		
	Measures		Yes	No	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
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	Compliance Indicator	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.	Measure has been met		
	Measures		Yes	No	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

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	Compliance Indicator Measures	Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.	Measure has been met	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
			Yes	No
F.3.a	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"> • HUD Leadership • ODEEO Director • EEO Compliance Officer <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			N/A

	their grade levels in the comments column.			
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 appropriate agency official of total monies paid?	X		
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 demonstrating same issues raised as in compliance matter.	X
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

Fiscal Year (FY) 2018

**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 2018 – 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.	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	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?
OBJECTIVE:	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 nonsexual harassment and establish a separate independent investigatory process and procedures and failing to provide clear investigation procedures.
RESPONSIBLE OFFICIAL:	Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; 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)
DATE OBJECTIVE INITIATED:	September 30, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2019
PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:	TARGET DATE (Must be specific)
Continuing discussions with OASA, ODEEO, AFGE, NFFE, and OGC.	Ongoing
Submit a final policy document to internal stakeholders for final review and concurrence.	September 30, 2019

Submit agency approved Anti-Harassment Program policies and procedures to EEOC for approval.	September 30, 2019
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.	June 30, 2020
REPORT OF MODIFICATIONS TO THE OBJECTIVE:	TARGET DATE (Must be specific)
Modification of the target date has been changed since the initiation of this objective on September 30, 2010.	September 30, 2019
HUD determined it would be beneficial for the discussions with AFGE and NFFE to continue throughout the establishment of HUD's Anti-Harassment Program plan and after its roll out.	On-going
Revise HUD's Anti-Harassment Program based on EEOC's guidance contained in the technical assistance letter dated July 6, 2017 by outlining minimum standards for the agency's anti-harassment program policy and procedures.	September 30, 2019
REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:	TARGET DATE (Must be specific)
In response to the EEOC recommendation for a more effective approach to preventing harassment in the workplace, HUD introduced <i>Civil Treatment</i> training. This training emphasized the process for reporting nonsexual harassment and separate investigatory process and procedures.	September 30, 2017
HUD finalized its Anti-Harassment Program (policies and procedures), which is now in HUD's internal clearance process that includes a review by HUD Unions. The Secretary's Anti-Harassment Policy Statement was reissued on July 19, 2018, addressing deficiencies identified in the EEOC's July 6, 2017, technical assistance letter.	September 30, 2018

HUD ensures that an EEO and Diversity related training including sexual harassment, is presented annually to employees. This course helps participants to identify the types of sexual harassment, elements of prohibited conduct in the workplace, rights of the Federal employee, and responsibilities of the Federal employer. It also addresses the rights and responsibilities that arise when there are allegations of sexual harassment by a nonsupervisory employee.

September 30, 2018

**U.S. Department of Housing and Urban Development
Fiscal Year (FY) 2018**

**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 2018 - 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 and system to track, analyze, and evaluate reasonable accommodation requests, and ensure compliance with EEOC's 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:	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)
DATE OBJECTIVE INITIATED:	September 30, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2019
PLANNED ACTIVITIES TOWARD COMPLETION OF THE OBJECTIVE:	TARGET DATE (Must be specific)
Finalizing discussions with AFGE and NFFE to address the comments contained in the EEOC's July 6, 2017, technical assistance letter regarding the Department's reasonable accommodation policies and procedures.	Ongoing
HUD will reroute the updated Reasonable Accommodation Program policies and procedures internally for review and concurrence.	April 30, 2019
Submit agency-approved Reasonable Accommodation Program policies and procedures to EEOC for final approval.	June 30, 2019
REPORT OF MODIFICATIONS TO THE OBJECTIVE:	TARGET DATE (Must be specific)
Modification of the objective to comply with updated regulations contained in section 501 of the Rehabilitation Act and guidance provided in the EEOC's July 6, 2017, technical assistance letter, and to reflect the appropriate Essential Element deficiencies.	September 30, 2019
Modification of the target date as changed since the initiation of this objective on September 30, 2010.	September 30, 2019
REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:	TARGET DATE (Must be specific)

Established HUD-wide working group to address reasonable accommodation process improvement measures to enhance uniformity, effectiveness, and efficiency. Held meetings with AFGE and NFFE to address the feedback received from EEOC regarding the Department's submitted policies and procedures.	October 2016 Completed
HUD updated its Reasonable Accommodation Program's policies and procedures, which has undergone the Department's final internal clearance review and concurrence process before submitting to EEOC for approval.	September 30, 2017 Completed
During the FY 2017 HUD EEO and Inclusion in the Workplace Conference, HUD welcomed EEOC guest speaker, Dexter Brook, Associate Director of Federal Sector Programs, who provided an update on Section 501 requirements explaining what a Department must do to comply with their legal obligation and serve as model employers for individuals with disabilities.	September 30, 2017 Completed
Reasonable Accommodation FAQ's are disseminated annually to the HUD-wide workforce via hud@work.	September 30, 2017 Ongoing
HUD's Headquarters and field offices established a formal relationship with the Computer/Electronic Accommodations Program (CAP) to provide technical assistance.	September 30, 2017 Completed
HUD implemented the Reasonable Accommodation Portal to monitor, track, and report on the reasonable accommodations process. HUD's Reasonable Accommodation Portal is an automated recordkeeping system that provides secure storage of reasonable accommodation request information, supporting documentation, decisions and justifications for decisions, appeals, and implementation. It will allow for increased accountability across the Department for timely and appropriate responses to reasonable accommodations requests.	September 30, 2018 Completed

Fiscal Year (FY) 2018

**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 2018 – Part H, Plan #3 (Updated)	
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:	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?
OBJECTIVE:	Establish an effective EEO complaint processing program that timely completes EEO investigations within 180 days and FADs within 60 days of the request.
RESPONSIBLE OFFICIAL:	Director, Office of Departmental Equal Employment Opportunity
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)
Hire Program Analyst to enhance tracking of EEO complaints and increase accountability for EEO timeliness.	September 30, 2019
REPORT OF MODIFICATIONS TO THE OBJECTIVE:	TARGET DATE (Must be specific)
REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE	TARGET DATE (MUST BE SPECIFIC)
FAD processing timeframes decreased significantly from 217 days in FY 2017 to 43 days in FY 2018.	September 30, 2018 (Completed)

The processing timeframes for EEO investigations decreased significantly from 421 in FY 2017 to 246 days in FY 2018.	September 30, 2019
Continuously taking steps to improve the efficiency of processing and managing EEO cases.	July 30, 2018 Ongoing
A new EEO Division Director was hired in February 2017 and a new Team Leader was assigned.	February 2017 Completed
Increased staff accountability by inserting new elements on performance plans.	February 29, 2017 Completed

**U.S. Department of Housing and Urban Development
Fiscal Year (FY) 2018**

**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 2018 – Part H, Plan #4 (Updated)	
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 to employees, supervisors, and senior leadership.	2017–2022
Develop strategies to implement the following recommendations identified in the FY 2018 ADR review: (1) Publishing ADR procedures to outline roles and responsibilities of offering ADR; (2) Training EEO counselors and ADR specialists in the process of offering and recording offers of ADR, and implementing quarterly ADR review of cases; (3) Creating training materials, to provide responsible officials with information regarding resources and process to resolve informal EEO complaints; and (4) Updating pre-ADR consultations materials to ensure	September 30, 2019

aggrieved persons are properly advised of process and expectations during ADR.	
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, HUD produced two videos on the benefits of the ADR program and promotes ADR during its annual EEO and diversity conference.	September 30, 2017
HUD established ADR standard operating procedures to enhance the efficiency and effectiveness of the program in FY 2018. This tool is also being used to develop effective training for employees, supervisors, and managers during FY 2019.	September 30, 2018 Completed
ODEEO conducted a review of the ADR program to analyze data and provide recommendation for program enhancement. As a result, four recommendations were developed: (1) Increasing HUD's ADR offer rate by publishing ADR procedures to outline roles and responsibilities of offering ADR; (2) Training EEO counselors and ADR specialists in the process of offering and recording offers of ADR, and implement quarterly ADR review of all cases and discuss potential alterations or improvements with EEOD Team; (3) Increasing HUD's ADR resolution rate by creating training materials, possibly in collaboration with OGC, to provide responsible officials information regarding resources and process to resolve informal EEO complaints during ADR; and (4) updating pre-ADR consultations materials to ensure aggrieved persons are properly advised of process and expectations during ADR.	September 30, 218 Completed

**U.S. Department of Housing and Urban Development
Fiscal Year (FY) 2018**

**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 2018 – Part H, Plan #5 (Completed)	
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:	While the current legal sufficiency review process is not optimal to ensure an adequate firewall, both ODEEO and OGC are committed to identifying a better solution. Given staffing challenges, the current approach has at least enabled the EEO office to obtain legal reviews on critical documents. In addition, OGC established as much of a firewall as possible within the constraints of the current structure and staffing. HUD is 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 senior level position may be advertised and filled during FY 2017.
OBJECTIVE:	To create the appropriate firewall between OGC legal sufficiency review and litigation.
RESPONSIBLE OFFICIAL:	Director, Office of Departmental Equal Employment Opportunity; Office of General Counsel
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)
REPORT OF MODIFICATIONS TO THE OBJECTIVE:	TARGET DATE (Must be specific)

REPORT OF ACCOMPLISHMENTS TO THE OBJECTIVE:	TARGET DATE (Must be specific)
<p>During FY 2018, ODEEO hired staff with the sufficient professional background to review FADs, settlement agreements, and other documents and reports for compliance with relevant laws, regulations, and precedents. Consultation with OGC occurs on an as needed basis. When such consultation occurs, ODEEO ensures that the attorney reviewing the matter is not serving in a defense function for the Department.</p>	<p>July 23, 2018 Completed</p>
<p>Quality assurance reviews were conducted by ODEEO with established internal procedures to ensure quality review and adherence to regulatory time frames. Process enhancements resulted in the reduction of FAD processing time frames.</p>	<p>September 30, 2018</p>

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 2018	
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		<p>HUD's representation of persons with disabilities (PWD) was 10.15% (759); 1.85% below the Federal agency-wide goal of 12%.</p> <p>However, HUD's FY 2018 participation rate of persons with targeted disabilities (PWTD) was 2.77% (207) of the total permanent workforce (7,373), exceeding the Federal Governmentwide goal of 2% of the Department's workforce.</p>	
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.		HUD analyzed this potential barrier by examining HUD's workforce data tables to compare the participation level of PWTDs against the EEOC's goal of 12%.	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		To date, HUD has not identified a barrier negatively affecting the participation rate of PWDs.	
OBJECTIVE: State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.		Continue to improve recruitment, outreach, and retention efforts of PWD and PWTD. Establish HUD's 5-year goals/plans to increase the participation rates of PWD and PWTD to reach the Governmentwide goal. Provide training to managers/supervisors on Schedule A Hiring Authorities. Utilize OPM's contract vendor and other resources to recruit and hire qualified PWD and PWTD.	
RESPONSIBLE OFFICIAL:		Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)	
DATE OBJECTIVE INITIATED:		October 1, 2016	
TARGET DATE FOR COMPLETION OF OBJECTIVE:		On-going	
Establish HUD's 5-year goals/plans to identify the barriers and increase the participation rates of PWD and PWTD to reach the Governmentwide goal.		Completed	
Provide training to managers/supervisors on Schedule A Hiring Authorities.		September 30, 2019	
Promote participation in HUD-wide related activities aimed at increasing the participation of PWD and PWTD.		September 30, 2019	

Utilize OPM’s contract vendor and other resources to recruit and hire qualified PWD and PWTD.	September 30, 2019
Resurvey the HUD workforce every 2 years to update the disability (as well as race, ethnicity, gender, and veteran) codes in workforce statistical information. This survey will be a voluntary self-identification process and will result in the creation of affirmative and diversity and inclusion plans to address and eliminate potential barriers to recruitment/outreach, hiring, professional development, promotion, and retention of PWD.	September 30, 2019
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	
<p>HUD continues to encourage all employees to update their disability status to enhance the accuracy of the Department’s workforce data.</p> <p>HUD offers a variety of training programs and courses to HUD supervisors and employees regarding disability laws and requirements. Additionally, in FY 2018, Treasury Executive Institute (TEI) provided a forum for HUD’s supervisors and senior leaders to discuss best practices in addressing Governmentwide initiatives, such as increasing the participation rates of PWDs.</p> <p>HUD’s Advocates for HUD Employees with Disabilities (AHED) ERG, reestablished their charter and created an interim steering committee to collectively address concerns and share information with the HUD workforce and disability community. In addition, AHED redesigned their internal website to increase accessibility and ListServ to effectively welcome new members.</p> <p>HUD continues to provide easy access in requesting assistive technology through its Assistive Technology Program for accommodating HUD employees who have visual, hearing, mobility, cognitive, or other impairments.</p> <p>HUD also established an interpreter services program to provide sign language/oral interpreting services to HUD employees who are deaf or hard of hearing.</p> <p>HUD reestablished roles, responsibilities, and clearinghouses to provide access to electronic and information technology by PWD. In addition, HUD consulted with the U.S. Access Board to focus on how HUD’s facilities can be made more accessible to PWDs.</p> <p>In promoting the use of the Job Accommodation Network (JAN) and in celebration of HUD’s National Disability Employment Awareness Month Program, HUD invited Anne Hirsh, Co-Director, JAN, to present an overview of the reasonable accommodations process. HUD also promotes the use of the JAN as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and job applicants for employment.</p>	

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 2018	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</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 (Hispanics) in mission critical occupations: (Economist Series (0110); Human Resources Management Series (0201); Miscellaneous Administration and Program Series (0301); Auditing Series (0511); Contracting Series (1102); and Information Technology Management Series (2210).</p>	
<p>BARRIER ANALYSIS:</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 reveals that HUD is experiencing lower than expected Hispanics (Latinos) participation rates in several of the mission critical occupations. HUD employed 597 (8.1%) permanent Hispanic employees in its workforce, which is slightly below the Governmentwide 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 47 employees from 655 (8.11%) in FY 2017.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</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 formalized organizational recruitment and succession planning strategies to increase targeted recruitment and outreach efforts specifically for Hispanics (Latinos) in mission critical related occupations.</p>	
<p>OBJECTIVE:</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 Hispanics in mission critical occupations. In addition, identify specific goals to achieve HUD's diversity vision, conduct an organizational assessment to provide a baseline to assist HUD in understanding the organizational climate and further strategic diversity management goals, and provide policy recommendations and an annual report documenting the progress of any established strategic planning efforts to the Secretary.</p>	

RESPONSIBLE OFFICIAL:	Office of the Assistant Secretary for Administration (OASA), Chief Human Capital Officer; Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)
DATE OBJECTIVE INITIATED:	October 1, 2016 (newly modified from FY 2015)
TARGET DATE FOR COMPLETION OF OBJECTIVE:	Ongoing
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Establish working group to identify recommendations to address the low participation rate of Hispanics.	September 30, 2019
Identify Minority Servicing Institutions or other organizations with which to partner to establish a pipeline for employment and address the low participation rate of Hispanics.	September 30, 2019
Conduct more extensive barrier analysis and develop corrective strategies by pay grades, major occupations, separations, promotions, hiring actions, and career and leadership development.	September 30, 2019
Review HUD's Hispanic Employment Program policy, roles, and responsibilities at national, regional, and field office levels, to ensure alignment with strategic efforts and enhance effectiveness.	September 30, 2019
Continue to utilize HUD's Diversity Council, and specifically the Latino Network and HUD National Image Chapter, to assist with departmental efforts to increase participation rates of Hispanics in mission critical occupations.	September 30, 2019

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

HUD analyzed and evaluated statistical reports of the workforce, identifying potential gaps, barriers, or areas for improvement, to be used in the formulation of HUD's Hispanic Affirmative Action Plan for FY 2019. Findings were as follows:

Although Hispanic males are generally underrepresented overall when compared to the CLF, at HUD they exceed the occupational CLF in five of the Department's eight mission critical occupational series, which include 0360, 0110, 0301, 1101, and 0511. Hispanic females are either at or above parity in job series 0360 and 2210. Hispanics in HUD's most populated job series (1101) represented 8.44 % of the total HUD participation of 2,312 employees. Hispanics exceeded their corresponding occupational CLF's for both genders in the 0360 job series.

Moving closer to achieving parity, Hispanic females represent 1.72 % in series 110, compared to the Occupational CLF of 1.80 %. In series 201, Hispanic males represent 0.0 % and females represent 3.37 %, compared to the OCLF of 3.70 % and 5.80 %, respectively. Hispanic females in series 301 represent 4.36 %, while the OCLF is 5.80 %. In series 511, 3.29 % of Hispanic females are close to full representation of the OCLF of 3.90 %.

As of September 30, 2018, HUD employed 597 (8.1 %) permanent Hispanic employees, which is below the Governmentwide participation rate of 8.5 % and significantly below the CLF participation rate of 9.96 %. The participation rate for permanent Hispanic employees decreased by 47 employees from 655 (8.11 %) in FY 2017. In FY 2018, HUD hired a total of 191 permanent employees of which 19 (9.9 %) were Hispanic-Latino, which is higher than the Governmentwide Hispanic new hires rate of 7.5 %. In addition, in FY 2018, HUD separated 568 permanent employees, of which 52 (9.16 %) were permanent Hispanic, which is slightly lower than the new hires Hispanic-Latino rate of 9.95 % during the same reporting period. In comparison, the separation rate of permanent Hispanic employees at HUD in FY 2017 was 43 (6.72 %).

Under HUD's Diversity Council, the Latino Network and HUD National Image Chapter serve as two affinity groups assisting senior leadership in developing and maintaining an effective workforce by: (1) promoting an inclusive work environment that furthers HUD's vision for diversity and (2) identifying specific initiatives and goals to achieve HUD's diversity, inclusion, and engagement vision.

HUD's Hispanic Employment Program Manager (HEPM) is a regular participant at the HUD Diversity Counsel quarterly meetings, representing the concerns and describing the initiatives of Hispanic-Latino employees at HUD. HUD's HEPM established working relationships with Hispanic employees and the president of the HUD National Image Chapter, participated in informal and strategic meetings and communications to discuss needs of HUD's Hispanic workforce, plan future collaborations, and inform Hispanic employees of relevant news, programs, and opportunities. HUD's HEPM also joined the National Counsel of Hispanic Employment Program Managers (NCHEPM), continued establishing working relationships (from previous engagement) with the chair, vice-chair and the past chair of the NCHEPM, and participated in monthly meetings.

HUD was formally invited by the National President of Image, Inc., to participate in the 2018 National Training Program to serve in the roles of plenary keynote speaker and diversity panelist to discuss HUD's support of ERGs supporting Hispanic employees.

HUD attended the [League of United Latin American Citizens](#) (LULAC) 2018 Federal Training Institute Partnership Forum held in Washington, DC, which provided an opportunity to network with vital partners and establish new relationships. While attending the LULAC Training Institute, HUD also partnered with NCHEPM to engage HUD's senior executives to serve as mentors for the Executive Leadership Mentoring Program.

HUD hosted a National Hispanic Heritage Month 2018 program titled *Hispanics: One Endless Voice to Enhance our Traditions*. The program included Latin music and distinguished guest speakers Anna Maria Farías, HUD Assistant Secretary for Fair Housing and Equal Opportunity; Judith Pérez-Caro, Ph.D., Director of Equity and Inclusion at the Georgetown University Law Center; and Heidi Ortiz, Vice Chair of the NCHEPM.

EEOC FORM 715-01 PART I	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
U.S. Department of Housing and Urban Development	FY 2018	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</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 noncompliance in establishing and maintaining an effective Reasonable Accommodation Program that complies with the governing laws and principles that require 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>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>HUD has not yet implemented procedures for reasonable accommodation for PWD and PWTD that are readily available to all employees and applicants for employment.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</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 trained employees and managers on their responsibilities under the Department’s reasonable accommodation process and procedures.</p> <p>In addition, HUD lacked a web-based tracking system that manages the reasonable accommodation process.</p>	
<p>OBJECTIVE:</p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Finalize HUD’s Reasonable Accommodation Policies and Procedures, incorporating feedback from EEOC and formalizing communications outlining responsibilities.</p> <p>Comply with the EEOC’s updated regulations concerning implementation of section 501 of the Rehabilitation Act of 1973.</p> <p>Train employees and supervisor on the reasonable accommodation process, and disseminate such procedures during new employee orientations and periodic employee and supervisor training sessions, and make reasonable accommodation procedures available</p>	

	via HUD's hud@work (intranet website) and www.hud.gov (external website).
RESPONSIBLE OFFICIAL:	Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)
DATE OBJECTIVE INITIATED:	October 1, 2016 (newly modified from FY 2015)
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2019
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Collaborate with HUD's Diversity Council and Advocates for HUD Employees with Disabilities (AHED), to assist Departmental efforts to promote an inclusive work environment.	September 30, 2017 Ongoing
Publish a more comprehensive reasonable process that provides increased transparency in the process and clearly articulates roles and responsibilities.	September 30, 2019
Conduct an assessment of all reasonable accommodation request to determine what trends, commonalities, and/or barriers exist for immediate process improvements.	September 30, 2019
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	
<ol style="list-style-type: none"> 1. HUD drafted new Reasonable Accommodation Program policies and procedures, based on EEOC feedback, which are in the HUD concurrence process and will be submitted to the EEOC for final approval. 2. HUD's AHED ERG reestablished their charter and created an interim steering committee to address concerns and share information with the HUD workforce and the HUD disability community. In addition, AHED redesigned their internal website and ListServ to be easier to navigate and welcome new members to the community. 	

3. HUD invited Anne Hirsh, Co-Director, JAN, to present an overview of the reasonable accommodations process, educating managers and employees on the successful means of communicating accommodation needs and services. HUD continues to promote the use of the JAN as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and applicants.
4. Submitted a response to EEOC's July 6, 2017, technical assistant letter regarding HUD's reasonable accommodation policies and procedures.
5. HUD implemented the Reasonable Accommodation Portal to monitor, track, facilitate and report on reasonable accommodation case management. HUD's Reasonable Accommodation Portal is an automated recordkeeping system that securely stores information on reasonable accommodation requests, supporting documentation, dispositions, decisions, appeals, and implementation. It also facilitates initial reasonable accommodation requests or requests for modifications and will provide information to enhance accountability for timely and appropriate responses to reasonable accommodations requests.

PART J

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

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

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

- a . C l u s t e r G S - 1 t o G S - 1 0 (P W D) Y e s N o
- b . C l u s t e r G S - 1 1 t o S E S (P W D) Y e s N o

Response: HUD's permanent PWD employees in clusters GS-01 to GS-10 is currently at 10.58% or 78 employees and GS-11 to SES is currently at 9.16% or 675 employees, which both fall below than the Federal goal of 12% by 1.42% and 2.84%, respectively.

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

- c . C l u s t e r G S - 1 t o G S - 1 0 (P W T D) Y e s N o
- d . C l u s t e r G S - 1 1 t o S E S (P W T D) Y e s N o

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

Response: HUD communicates its numerical goals with hiring managers and recruiters through Department-wide dissemination and posting of its annual Management Directive (MD) 715 Report, and by conducting an annual State of Equal Employment Opportunity (EEO) Brief for the Secretary, Deputy Secretary, and senior leadership. In addition, HUD regularly briefs program offices on workforce diversity, including numerical hiring and attrition goals for 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 persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR 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**
2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	<i>Lisa E. Swinney, Selective Placement Coordinator, OCHCO</i> lisa.e.swinney@hud.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	<i>Lisa E. Swinney, Selective Placement Coordinator, OCHCO</i> lisa.e.swinney@hud.gov
Processing reasonable accommodation requests from applicants and employees	4	0	0	<i>Erica M. Jones, Reasonable Accommodation Branch Chief, OCHCO</i> erica.m.jones@hud.gov
Section 508 Compliance	0	1	40	<i>Jeffrey Salit, Section 508 Coordinator, OCIO</i> jeffrey.l.salit@hud.gov
Architectural Barriers Act Compliance	0	0	9	<i>Jeanine M. Worden, ABA Coordinator, OGC</i> jeanine.m.worden@hud.gov

Special Emphasis Program for PWD and PWTB	1	0	0	<i>Eric M. Gima, Diversity Program Manager, Affirmative Employment Division, ODEEO</i> eric.m.gima@hud.gov
Processing computer accommodation (Assistive Technology Program) requests from applicants and employees	4	0	0	<i>Jeffrey Salit, Assistive Technology Program Coordinator, OCIO</i> Jeffrey.l.salit@hud.gov

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

Yes

No

Response: It is not clear what specific training disability program staff took during FY 2018; however, the Office of Departmental Equal Employment Opportunity (ODEEO) is establishing a workgroup with the Office of the Assistant Secretary for Administration, the Office of the Chief Financial Officer, and the Office of General Counsel to set parameters on the type of training that disability program staff should receive. In addition, the workgroup will track the training that such staff complete and include the information in the FY 2019 report. During FY 2018, disability program staff took training that is available Department-wide. Such training includes, using the Schedule A hiring authority and responding to requests for reasonable accommodation.

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 continues to provide sufficient support and resources to the agency’s Disability Employment Program.

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:

- Does HUD 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 HUD’s procedures for reasonable accommodation?

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 with EEOC guidance titled *Procedures for Providing Reasonable Accommodation for Individuals With Disabilities*, Executive Order 13164 titled *Requiring Federal Agencies To Establish Procedures To Facilitate the Provision of Reasonable Accommodation*, Section 501 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).

Accomplishments:

- HUD reentered deliberations regarding its newly developed Reasonable Accommodation Program’s policies and procedures in order to finalize and submit to the EEOC for review and concurrence by September 30, 2019. HUD will continue to keep EEOC closely apprised of any updates and future developments surrounding its reasonable accommodation policies and procedures.
- HUD implemented the Reasonable Accommodation Portal to monitor, track, facilitate, and report on administrative functions and case management of reasonable accommodations requests at HUD. HUD’s Reasonable Accommodation Portal is an automated record-keeping system with functions that include secure storage of reasonable accommodation request information, supporting documentation, disposition of requests, decisions and justifications for decisions, appeals, and implementation. It will also track information used to hold the agency accountable for timely and appropriate responses to reasonable accommodations requests. Finally, it will facilitate the development and maintenance of a system of records for reasonable accommodation requests, generate procedural notices, and generate summary reports.

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 PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

Response: HUD continues to promote the participation of all HUD-wide activities aimed at increasing the participation of PWDs and PWTDs, including utilizing OPM's contract vendor (Bender Consulting) and State Vocational Rehabilitation Centers to recruit, hire, and retain qualified PWDs and PWTDs. In addition, HUD also utilizes the Department of Labor's (DOL) Workforce Recruitment Program, which connects Federal employers with highly motivated college students and recent graduates with disabilities eager to enter the workplace. Finally, HUD hosted a successful job fair to recruit qualified GS-7 through GS-15 PWD candidates for all program offices. More than 660 veterans, peace corps and vista, and other Schedule A applicants visited HUD program office tables throughout the day, which resulted in over 27 selections and in 7 final job offers being made to date.

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

Response: HUD reviews the respective program office's Position Organizational Listing (POL) for potential vacancies and future positions. Qualified Schedule A applicants are then referred to the program offices' Administrative Officers for immediate review and consideration prior to a vacancy being announced. In addition, as stated above, HUD hosted a successful job fair to recruit PWD candidates for all program offices, which resulted in over 27 selections and in 7 final job offers being made to date.

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 verifies the appropriate proof of disability supporting documentation issued by licensed medical professionals, vocational rehabilitation specialists, or any Federal or state agency to determine eligibility. Applicants are forwarded either by review of the POL for anticipated positions or at the request of a program office. All applicants eligible for a special hiring authority are referred on a separate certificate after review of applications through vacancy announcement. Selecting officials receive quarterly training on how the authority can be used, and they are given an additional overview when 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 provides ad hoc training to all program hiring managers and administrative officers on qualified hiring authorities and practices to increase HUD’s use of the Schedule A hiring authority and Veterans recruitment programs. This training is provided in person and virtually for field managers.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

Response: HUD continues to utilize OPM’s contract vendor (Bender Consulting), DOL’s Workforce Recruitment Program, and other resources to recruit and hire PWDs and PWTDs. In addition, HUD continues to partner with the Division of Vocational Rehabilitative Services and the Department for the Blind and Vision Impaired to promote future hiring opportunities for PWDs and PWTDs.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
- e. New Hires for Permanent Workforce (PWD) **Yes No**
 - f. New Hires for Permanent Workforce (PWTD) **Yes No**

Response: Of HUD’s 239 new hires in the permanent workforce, PWDs accounted for 27 or 11.30%, which is slightly below the 12% goal.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
- g. New Hires for MCO (PWD) **Yes No**
 - h. New Hires for MCO (PWTD) **Yes No**

Response: In FY 2018, except for series 301 (12.07%), 360 (20%), and 511 (13.51%), MCOs are below the Governmentwide goal of 12% with a new hire rate of 0.00% for PWDs. With respect to PWTDs, all MCO were below the Governmentwide goal of 2% except series 301 (5.17%) and 1101 (2.70%).

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

- i. Qualified Applicants for MCO (P W D) Yes No
- j. Qualified Applicants for MCO (P W T D) Yes No

Response: HUD does not have the applicant flow data to meet this requirement. The ODEEO will work with the Office of the Assistant Secretary of Administration over the next two fiscal years to establish a mechanism by which such data may be obtained and analyzed.

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

- k. Promotions for MCO (P W D) Yes No
- l. Promotions for MCO (P W T D) Yes No

Response: HUD does not have the applicant flow data to meet this requirement. The ODEEO will work with the Office of the Assistant Secretary of Administration over the next two fiscal years to establish a mechanism by which such data may be obtained and analyzed.

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 persons with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for persons with disabilities.

A. ADVANCEMENT PROGRAM PLAN

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

Response: In addition to HUD's annual Management Directive (MD) 715 Report and its Inclusive Diversity Strategic Plan, the ODEEO will collaborate with the Office of the Assistant Secretary of Administration, Office of the Chief Financial Officer, and Office of General Counsel to create a workgroup that is responsible for reestablishing a 5-year plan for hiring PWD and PWTD. The 5-year plan will result in implementation of strategies to promote the advancement of opportunities for PWDs and PWTDs in all mission critical occupations and grade levels. These strategies will enable HUD to sustain a 2 % goal for all new PWTD hires and continue to promote a 12 % goal for PWD hires over the next 5 years.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Response: Unfortunately, in FY2018 the agency did not capture data concerning its career development program opportunities specifically isolated by PWDs and PWTDs. In FY 2019, ODEEO will collaborate with our stakeholders to establish a working group to address the Department's career development opportunities and training needs to ensure that such data is captured for the current period and going forward.

2. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a . A p p l i c a n t s (P W D) Y e s N o
b . S e l e c t i o n s (P W D) Y e s N o

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant

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

- a. Applicants (PWTD) Yes **No**
- b. Selections (PWTD) Yes **No**

C. AWARDS

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

- a. Awards, Bonuses, & Incentives (PWD) Yes **No**
- b. Awards, Bonuses, & Incentives (PWTD) Yes **No**

Response: In FY 2018, HUD identified triggers involving the percentage of PWDs for time-off awards from 11 to 20 hours and 31 to 40 hours, and cash awards from \$ 500 up to \$2,999. With respect to PWTDs, triggers were also noted for time-off awards from 11 to 40 hours and for cash awards from \$ 500 up to \$2,999.

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

- a. Pay Increases (PWD) Yes **No**
- b. Pay Increases (PWTD) Yes **No**

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

- a. Other Types of Recognition (PWD) Yes **No**
- b. Other Types of Recognition (PWTD) 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 (PWD) Yes **No**
- ii. Internal Selections (PWD) Yes **No**

b. Grade GS-15

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

- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) **Yes** No
 - ii. Internal Selections (PWD) **Yes** No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) **Yes** No
 - ii. Internal Selections (PWD) **Yes** No

Response: In FY 2018, the percentage of PWD among the qualified internal applicants for grade GS-13 (5.87%), GS-14 (3.09%), and GS-15 (0.00%) fell below the benchmark.

In FY 2018, the percentage of PWD among the selectees for promotion at grades GS-13 (2.86%), 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 (PWTD) **Yes** **No**
 - ii. Internal Selections (PWTD) **Yes** **No**
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTD) **Yes** No
 - ii. Internal Selections (PWTD) **Yes** No
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) **Yes** No
 - ii. Internal Selections (PWTD) **Yes** No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) **Yes** **No**
 - ii. Internal Selections (PWTD) **Yes** **No**

Response: In FY 2018, the percentage of PWTDs among the qualified internal applicants for grade GS-14 (0.88%) and GS-15 (0.00%) fell below the benchmark.

In FY 2018, the percentage of PWTDs among the selectees for promotion at grades GS-13 (0.95%), 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 PWD's among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- | | | |
|-----------------------------|------------|-----------|
| a. New Hires to SES (PWD) | Yes | No |
| b. New Hires to GS-15 (PWD) | Yes | No |
| c. New Hires to GS-14 (PWD) | Yes | No |
| d. New Hires to GS-13 (PWD) | Yes | No |

Response: HUD's overall permanent new hire rate for FY 2018 resulted in 11.30 % for PWDs, just shy of the Governmentwide goal of 12 %. Specifically, the Department missed the 12 % goal for PWDs within the following grade levels: SES (8.33 %), GS-15 (7.05 %) and GS-14 (11.27 %). Conversely, at the GS-13 (18 %) grade level, the Department exceeded the 12 % goal.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD's among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- | | | |
|------------------------------|------------|-----------|
| a. New Hires to SES (PWTD) | Yes | No |
| b. New Hires to GS-15 (PWTD) | Yes | No |
| c. New Hires to GS-14 (PWTD) | Yes | No |
| d. New Hires to GS-13 (PWTD) | Yes | No |

Response: HUD's overall permanent new hire rate for FY 2018 resulted in 2.51 % for PWTDs. Within grade levels GS-13 (2.40 %), GS-14 (7.65 %), and GS-15 (3.13 %) the Department exceeded the 2 % goal. However, at the SES grade level, HUD's hiring rate was 0.00 %.

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 (PWD) | Yes | No |
| ii. Internal Selections (PWD) | Yes | No |

b. Managers

- | | | |
|--|------------|----|
| i. Qualified Internal Applicants (PWD) | Yes | No |
| ii. Internal Selections (PWD) | Yes | No |

c. Supervisors

- | | | |
|--|------------|----|
| i. Qualified Internal Applicants (PWD) | Yes | No |
| ii. Internal Selections (PWD) | Yes | No |

Response: In FY2018, HUD found that triggers exist for PWDs among applicants and selectees for new hires to supervisor, manager, and executive positions. Based on the data tables, there were no internal selections at SES grade level. Unfortunately, our workforce data tables do not speak to any qualified internal applicants or internal selections segregated between managers and supervisors. While HUD can speak to the overall number of GS-13s through GS-15s hired, we are currently limited in our ability to distinguish between supervisory and nonsupervisory categories for the purpose of annotating a more concise reply. Specifically, the Department missed the 12 % goal for PWDs within the following grade levels: SES (8.33 %), GS-15 (7.05 %) and GS-14 (11.27 %). Conversely, at the GS-13 (18 %) grade level, the Department exceeded the 12 % goal for all new hires.

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

a. Executives

- | | | |
|---|------------|----|
| i. Qualified Internal Applicants (PWTD) | Yes | No |
| ii. Internal Selections (PWTD) | Yes | No |

b. Managers

- | | | |
|---|------------|----|
| i. Qualified Internal Applicants (PWTD) | Yes | No |
| ii. Internal Selections (PWTD) | Yes | No |

c. Supervisors

- | | | |
|---|------------|----|
| i. Qualified Internal Applicants (PWTD) | Yes | No |
| ii. Internal Selections (PWTD) | Yes | No |

Response: In FY2018, the agency found that triggers exist for PWTDs among applicants and selectees for new hires to supervisor, manager, and executive positions. Based on the data tables, there were no internal selections at SES grade level. Unfortunately, our workforce data tables do not speak to any qualified internal applicants or internal selections segregated between managers and supervisors. While HUD can speak to the overall number of GS-13s through GS-15s hired, we are currently limited in our ability to distinguish between supervisory and non-supervisory categories for the purpose of annotating a more concise reply. HUD’s overall permanent new hire rate for FY 2018 resulted in 2.51% for PWTDs. Within grade levels GS-13 (2.40%), GS-14 (7.65%), and GS-15 (3.13%) the Department exceeded the 2% goal for new hires. However, at the SES grade level, HUD’s hiring rate was 0.00%.

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

- | | |
|------------------------------------|---------------|
| a. New Hires for Executives (PWD) | Yes No |
| b. New Hires for Managers (PWD) | Yes No |
| c. New Hires for Supervisors (PWD) | Yes No |

Response: In FY2018, the agency found that triggers exist for PWDs among selectees for new hires to supervisor, manager, and executive positions. Based on the data tables, HUD can speak to the overall number of GS-13s through GS-15s hired; however, we are currently limited in our ability to distinguish between supervisory and non-supervisory categories for the purpose of annotating a more concise reply. Specifically, the Department missed the 12% goal for PWDs within the following grade levels: SES (8.33%), GS-15 (7.05%), and GS-14 (11.27%). Conversely, at the GS-13 (18%) grade level, the Department exceeded the 12% goal for all new hires.

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

- | | |
|-------------------------------------|---------------|
| a. New Hires for Executives (PWTD) | Yes No |
| b. New Hires for Managers (PWTD) | Yes No |
| c. New Hires for Supervisors (PWTD) | Yes No |

Response: In FY2018, the agency found that triggers exist for PWTDs among selectees for new hires to supervisor, manager, and executive positions. Based on the data tables, HUD can speak to the overall number of GS-13s through GS-15s hired; however, we are currently limited in our ability to distinguish between supervisory and non-supervisory categories for the purpose of annotating a more concise reply. HUD’s overall permanent new hire rate for FY 2018 resulted in 2.51% for PWTDs. Within grade levels GS-13 (2.40%), GS-14 (7.65%), and GS-15 (3.13%) the Department exceeded the 2% goal for new hires. However, at the SES grade level, HUD’s hiring rate was 0.00%.

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: The agency does not have an automated system to monitor the status of Schedule A employees with disabilities. Instead, these statuses are monitored manually by the Shared Service Provider and reminder notifications are sent to the managers to take appropriate action.

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

a . V o l u n t a r y S e p a r a t i o n s (P W D) Y e s N o

b . I n v o l u n t a r y S e p a r a t i o n s (P W D) Y e s N o

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

a . V o l u n t a r y S e p a r a t i o n s (P W T D) Y e s N o

b . I n v o l u n t a r y S e p a r a t i o n s (P W T D) Y e s N o

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

N/A

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b)), concerning the accessibility of agency technology, and the

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

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

Response: HUD implemented an agency-wide policy on Section 508 of the Rehabilitation Act and Accessible Technology. The Policy sets forth the Department's framework for the implementation and integration of Section 508 requirements, including identifying employee and applicant rights under Section 508, describing how to file a complaint, and explaining which HUD offices are responsible for receiving, recording, timely reviewing, and coordinating efforts regarding a Section 508 complaint. The Policy is publicly 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 General Services Administration: 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/physical_accessibility#_Architectural_Barriers_Act.

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 continues to engage in several education and outreach endeavors aimed at improving accessibility of its facilities and technology, pursuant to 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; (2) review of electronic and information technology in departmental clearance and various 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, which reports to the Deputy Secretary and HUD leadership; and (4) increased engagement with 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 Departmentwide initial requests for reasonable accommodations during this reporting period was approximately 35 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/or in-person management training on reasonable accommodation, along with providing an updated video on the agency's internal website, titled *Overview of Reasonable Accommodation for Managers*, led by an Assistant General Counsel representative from the EEOC. In addition, FAQs and supplemental trainings and videos are provided to the workforce through HUD Learn.

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 is updating its Reasonable Accommodation Program policy 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 policy outlines the process for requesting PAS, determining whether such services are required, and the agency's right to deny such requests when provision of the services would pose an undue hardship, which are the same as for reasonable accommodation.

The updated policy completed the Department's internal clearance process, and suggested edits are currently being reviewed and incorporated. The Department has not yet received any requests for PAS but has a contractor in place to ensure that PAS will be made available to employees with disabilities when needed. Also, the Department has developed and will timely implement an affirmative employment plan for PWTDS. For this purpose, HUD is utilizing this report as our affirmative employment plan for PWTDS. Furthermore, the Department will employ this report to measure our progress on PAS and all other matters impacting PWTDS.

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 anticipates that the process for finalizing the updated reasonable accommodation policy will be completed by the end of the third quarter of Calendar Year 2019.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Yes No

- **Response:** The total number of formal complaints for FY 2018 was 94. Of the 94 complaints, 24 complaints were filed by PWD alleging harassment; 26%, which exceeded the Governmentwide average of 18.05%.

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. **N/A**

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Yes No

Response: Of the 94 complaints, 20 alleged a failure to provide RA; 21%, which exceeded the Governmentwide average of 12.50%.

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

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. **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 PWD and/or PWTD?

Yes No

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

Yes No

0. 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: HUD's non-compliance in establishing and maintaining an effective *Reasonable Accommodation Program* that complies with the governing laws and principles that require Federal agencies to establish procedures to facilitate the provisions of reasonable accommodations.

Further, HUD received a notice of deficiency in this area from EEOC in a technical assistance letter dated July 6, 2017.

Barrier(s): HUD has not trained employees and managers on their responsibilities under the Department's reasonable accommodation process and procedures. In addition, HUD lacked a web-based tracking system that manages the reasonable accommodation process.

Objective(s): Finalize HUD's Reasonable Accommodation Policies and Procedures, incorporating feedback from EEOC and formalizing communications outlining responsibilities.

Comply with the EEOC's updated regulations concerning implementation of Section 501 of the Rehabilitation Act of 1973.

Train employees and supervisor on the reasonable accommodation process and disseminate such procedures during new employee orientations and periodic employee and supervisor training sessions and make reasonable accommodation procedures available via HUD's HUD@Work (intranet website) and www.hud.gov (external website).

Responsible Official(s):

Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)

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

Target Date (mm/dd/yyyy): September 30, 2019

Planned Activities:

Collaborate with HUD’s Diversity Council and Advocates for HUD Employees with Disabilities (AHED), to assist departmental efforts to promote an inclusive work environment.	September 30, 2019 (Ongoing)
Publish a more comprehensive reasonable process that provides increased transparency in the process and clearly articulates roles and responsibilities.	September 30, 2019
Assess all reasonable accommodation requests to determine what trends, commonalities, and/or barriers exist for immediate process improvements.	September 30, 2019

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

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

Completion Date (mm/dd/yyyy): TBD

Fiscal Year: 2018

Accomplishments:

- HUD drafted new Reasonable Accommodation Program policies and procedures, per EEOC feedback, that are in the HUD concurrence process and will be submitted to the EEOC for final approval.
- HUD’s AHED ERG reestablished their charter and created an interim steering committee to address concerns and share information with the HUD workforce and the HUD disability. community. In addition,

AHED redesigned their internal website and ListServ to be easier to navigate and welcome new members to the community.

- HUD invited Anne Hirsh, Co-Director, JAN, to present an overview of the reasonable accommodations process, educating managers and employees on the successful means of communicating accommodation needs and services. HUD continues to promote the use of the JAN as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and applicants.
- Submitted a response to EEOC's July 6, 2017, technical assistant letter regarding HUD's reasonable accommodation policies and procedures.
- HUD implemented the Reasonable Accommodation Portal to monitor, track, facilitate, and report on reasonable accommodation case management. HUD's Reasonable Accommodation Portal is an automated recordkeeping system that securely stores information on reasonable accommodation requests, supporting documentation, dispositions, decisions, appeals, and implementation. The portal also facilitates reasonable accommodation requests and requests for modifications to provide information to improve timely and appropriate responses.

Trigger 2: HUD's FY 2018 participation rate of persons with targeted disabilities (PWTD) was 2.77% (207) of the total permanent workforce (7,373), exceeding the Federal Governmentwide goal of 2% of the Department's workforce.

In addition, HUD's representation of persons with disabilities (PWD) was 10.15% (759).

Barrier(s): There appears to be a lack of awareness on the part of hiring managers of the special hiring authorities that could be used to noncompetitively hire individuals with targeted disabilities and of established organizations whose mission is to assist Federal agencies in finding qualified candidates with disabilities.

Objective(s): Continue to improve recruitment, outreach, and retention efforts of PWDs and PWTDs.

Responsible Official(s):

Chief Human Capital Officer, Office of the Assistant Secretary for Administration (OASA); Director, Office of Departmental Equal Employment Opportunity (ODEEO); and the Office of General Counsel (OGC)

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

Target Date (mm/dd/yyyy): 09/30/2019

Planned Activities:

Establish HUD’s 5-year goals/plans to increase the participation rates of PWD and PWTD to reach the Governmentwide goal.	September 30,2019
Provide training to managers/supervisors on Schedule A Hiring Authorities.	September 30, 2019
Promote participation in HUD-wide related activities aimed at increasing the participation of PWD and PWTD.	September 30, 2019
Utilize OPM’s contract vendor and other resources to recruit and hire qualified PWD and PWTD.	September 30, 2019
Resurvey the HUD workforce every 2 years to update the disability (as well as race, ethnicity, gender, and veteran) codes in workforce statistical information. This survey will be a voluntary self-identification process and will result in the creation of affirmative and diversity and inclusion plans to address and eliminate potential barriers to recruitment/outreach, hiring, professional development, promotion, and retention of PWD.	September 30, 2019

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

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

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

Fiscal Year: 2018

Accomplishments:

- HUD continues to encourage all employees to update their disability status to enhance the accuracy of the Department’s workforce data.
- HUD offers a variety of training programs and courses to HUD supervisors and employees regarding disability laws and requirements. Additionally, in FY 2018, Treasury Executive Institute (TEI) provides a forum for HUD’s supervisors and senior leaders to discuss best practices in addressing Governmentwide initiatives, such as increasing the participation rates of PWDs.
- HUD’s Advocates for HUD Employees with Disabilities (AHED) ERG, reestablished their charter and created an interim steering committee to collectively address concerns and share information with the HUD workforce and disability community. In addition, AHED redesigned their internal website to increase accessibility and ListServ to effectively welcome new members.
- HUD continues to provide easy access in requesting assistive technology through its Assistive Technology Program for accommodating HUD employees who have visual, hearing, mobility, cognitive, or other impairments.

- HUD also established an interpreter services program to provide sign language/oral interpreting services to HUD employees who are deaf or hard of hearing.
- HUD reestablished roles, responsibilities, and clearinghouses to provide access to electronic and information technology by PWD. In addition, HUD consulted with the U.S. Access Board to focus on how HUD's facilities can be made more accessible to PWDs.
- In promoting the use of the Job Accommodation Network (JAN) and in celebration of HUD's National Disability Employment Awareness Month Program, HUD invited Anne Hirsh, Co-Director, JAN, to present an overview of the reasonable accommodations process. HUD also promotes the use of the JAN as a resource in providing expert advice and consultation on reasonable accommodation matters for HUD employees and job applicants for employment.

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

Response: HUD's disability program responsibilities are currently split between the Office of Departmental Equal Employment Opportunity (ODEEO) and the Office of the Assistant Secretary for Administration (OASA). Presently, this structure creates challenges with respect to completing activities and ensuring accountability for a successful disability program. In addition, several personnel changes occurred within the disability program over the past year that impacted timely completion of planned activities. However, ODEEO and OASA leadership are committed to a collaborative approach that will allow the timely completion of the planned activities. In addition, the continuity of new permanent disability program staff will enable HUD to better achieve our goals for PWDs and PWTDs.

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

Response: The actual impacts of the completion of planned activities, including training and the implementation of the HUD Reasonable Accommodation Portal, are wide ranging and allow HUD to become an employer of choice for PWDs and PWTDs. In FY 2018, HUD exceeded the Federal Governmentwide participation goal for PWTd (2.77%) and HUD's attrition rates demonstrate that HUD is generally retaining PWTDs. At least two members of the HUD Senior Executive Service cadre identify as PWTd. HUD also has a robust and easily accessible Assistive Technology Program and makes efforts to reach out to the disability community through a newly reestablished ERG. Finally, the implementation of the Reasonable Accommodation Portal allows HUD employees to more easily request reasonable accommodations and understand the status of their request, in addition to allowing HUD to enhance timeliness and accuracy of reasonable accommodation decisions.