

#### **MFT Mission and Overview**

#### Q1.) Why is Multifamily transforming?

Since its creation in 1934, Multifamily has supported FHA and HUD in achieving the shared mission of creating strong, sustainable, inclusive communities and quality affordable homes for all. Multifamily has a longstanding track record of supporting the development of affordable, privately-owned apartments for the elderly, the disabled and low-income Americans as well as serving traditionally under-served markets across the country.

Since the 2008 financial crisis, Multifamily has experienced unprecedented demand for services in a challenging fiscal environment. Between 2008 and 2013, Multifamily experienced an increase in originations from \$3 billion nationally to almost \$18 billion—a six-fold increase in the total volume of originations. In addition to the volume of originations, the complexity of the work increased. As a result, application processing times stood in excess of 9 months, with some customers experiencing wait times of nearly 2 years. Offices and staff were overwhelmed by the high volumes of new and complex assets.

Significant improvements were made through *Breaking Ground* in Production and *Sustaining our Investments* in Asset Management, however, challenges remain across the country, including geographic fragmentation, workload imbalances, inconsistent customer service, and operational practices that do not effectively manage risk or utilize the talent of employees.

Based on academic research and means-tested practices of industry peer organizations, it is clear that Multifamily can adopt a more effective operating model that will allow employees to accomplish more mission-related work at a higher quality, with less effort and fewer resources. The *Multifamily for Tomorrow* is designed to achieve this objective.

#### Q2. ) What are the components of *MFT*?

MFT consists of the following four components, which reflect industry best practices:

- 1. Streamlining the organizational structure in Headquarters and the Field
- 2. National Workload Sharing
- 3. The *Underwriter Model* and risk-based processing in Production, and
- 4. The Account Executive Model in Asset Management

#### Q3.) What is vision for the *Multifamily for Tomorrow (MFT)* transformation?

Multifamily leadership is committed to the following vision for MFT:

We will cultivate an exceptional work environment for Multifamily employees by:

- fostering a culture of consistency and innovation,
- creating a modern and agile work environment, and
- enhancing opportunity and accountability throughout Multifamily.

We will improve our business model by:

- providing better services to customers and stakeholders,
- operating more efficiently and consistently, and
- improving risk management.



### Streamlining the Organizational Structure

# Q4.) How has the plan to streamline Field operations changed based on the recent direction from Congress?

There will be one change to the overall transformation plan based on directions Multifamily has received from Congress, which is that Asset Management employees will remain in their existing locations under the current authorization received from Congress. All other aspects of the transformation have been blessed by Congress and will take place as planned by Multifamily. All staff not currently part of Asset Management will be consolidated into twelve "core" offices, and HUD will proceed with implementing workload sharing, the Underwriter Model in Production, and the Account Executive Model in Asset Management.

# Q5.) Will Multifamily continue to pursue additional changes to the plan to streamline Field operations?

Multifamily leadership believes that the original plan to centralize Asset Management operations into the twelve core offices will best position Multifamily to pursue its mission in the future. Accordingly, HUD will continue to work with Congress to pursue full approval of its transformation plan as part of the fiscal year 2015 budget process. Employees will be clearly and timely notified about any updates to the status of the transformation plan as approved by congress.

#### Q6.) What will the field structure look like for Multifamily under the new model?

Beginning with Wave 1, Multifamily will move to a five-region field structure. The core offices for each of the five regions will include one Regional Center and one or two Regional Satellite Offices. The future regional model will be as follows:

- Southern Region: Fort Worth (Regional Center) and Kansas City (Regional Satellite Office)
  (Asset Management offices: Albuquerque, Des Moines, Houston, Little Rock, New Orleans, Oklahoma City, Omaha, St. Louis, San Antonio, Shreveport, Tulsa)
- 2. <u>Midwest Region</u>: Chicago (Regional Center), Detroit, and Minneapolis (Regional Satellite Offices) (Asset Management offices: Cleveland, Columbus, Indianapolis, Milwaukee)
- Southeast Region: Atlanta (Regional Center) and Jacksonville (Regional Satellite Office)
  (Asset Management offices: Birmingham, Caribbean, Columbia, Greensboro, Jackson, Knoxville, Louisville, Miami, Nashville)
- Mortheast Region: New York (Regional Center) Boston, and Baltimore (Regional Satellite Offices)
  (Asset Management offices: Buffalo, Charleston, Hartford, Manchester, Newark, Philadelphia,
  Pittsburgh, Providence, Richmond, Washington)
- 5. Western Region: San Francisco (Regional Center) and Denver (Regional Satellite Office)
  (Asset Management offices: Honolulu, Las Vegas, Los Angeles, Phoenix)
  \*Offices in the existing Seattle Hub will become part of the Office of Healthcare Programs

Beginning with Wave 1, Production and other non-Asset Management employees located in non-core offices will relocate to core office locations in accordance with the preference survey results. Although Asset Management employees will continue to remain in place, future organizational growth for Multifamily will be limited to the five Regional Centers and seven Regional Satellite Offices. Wave 1 employees will be granted their first preference for relocation.

#### Q7.) What is the updated timeline for Wave 1?

The current projected timeline for Wave 1 is as follows:

<u>Milestone</u> <u>Projected Date</u>

Field reassignment letters sent out Monday, June 30

Wave 1 buyout window Monday, June 30—Tuesday July 16

New hires onboarded Monday, September 22

Report to duty date for relocating employees Monday, October 6

Off the rolls date for employees accepting buyouts Monday October 25

New model training completed Monday January 5

#### Q8.) What is the updated timeline for future waves?

The projected timeline for future waves is as follows:

Wave 2 (Midwest Region): Buyouts expected early fall 2014; Report-to-duty expected winter 2015

Wave 3 (Southeast Region): Buyouts expected early Spring 2015; Report-to-duty expected early summer 2015

Wave 4 (Northeast Region): Buyouts expected summer 2015; Report-to-duty expected fall 2015

Wave 5 (Western Region): Buyouts expected late winter/early spring 2016; Report-to-duty expected spring 2016.

#### Q9.) What criteria were used to select core offices?

To select the twelve core office locations (Regional Center and Regional Satellite Offices) Multifamily considered the following criteria for each of the existing 17 hubs:

- 1. Asset Management workload (total assets) and Production workload (the historical 5-year average of annual firm commitments)
- 2. FTE count in each office location
- 3. FPM Regional Administrator presence
- 4. Geographic dispersion between offices within a region

An in-depth analysis the office selection process and the data used in the decision-making process are contained in the Multifamily Housing Transformation Report to Congress, which DAS Metcalf shared with employees on February 14, 2014.

#### Q10.) How will the new field model improve Multifamily?

Multifamily's current field structure is highly decentralized with over 50 locations organized into 17 regional hubs. The large number of direct reports, impedes effective communication and employee engagement, and makes it difficult for Multifamily to maintain consistent programmatic delivery. These factors have also led to inconsistent customer service and program delivery, inhibited risk management, and created logistically impossible hurdles to implementing and sustaining large-scale initiatives.

By streamlining the Multifamily field structure through consolidation into a five-region model with five Regional Centers and seven Regional Satellite Offices, Multifamily will facilitate clear communication, consistency and flexibility needed to effectively execute the mission.

#### Q11.) What is the future of Asset Management in the field?

HUD will continue to work with Congress to pursue full approval of the transformation plan as part of the fiscal year 2015 budget process, including the consolidation of Asset Management. Going forward, under the existing approval from Congress, future hiring and promotion opportunities will be targeted towards core office locations

(Regional Center and Regional Satellite Offices). For Asset Management, it has not been determined whether specialized roles will be available outside of core offices. It is the goal of Multifamily to provide on-site supervision in larger Asset Management offices.

#### Q12.) How is Multifamily streamlining Headquarters operations?

Multifamily is realigning its headquarters organizational structure into four offices: Production, Asset Management, Recapitalization, and Field Operations. These changes will reduce duplication and provide better support and service to the field and to our external stakeholders.

More specifically, the Office of Housing Assistance and Grants Administration (HAGA) and the Office of Housing Assistance Contract Administration Oversight (HACAO) will be merged into the Office of Asset Management, which will be titled Office of Asset Management and Portfolio Oversight. The Office of Development will be renamed the Office of Multifamily Production. The Office of Affordable Housing Preservation will become the Office of Recapitalization, reflecting its focus on recapitalizing assisted housing. A new Office of Field Support and Operations will provide dedicated support to the field. We will also be making changes within the headquarters front office to streamline the way we develop policy and the way we provide administrative and technological support. Across all of these offices, Multifamily will make operational improvements to generate efficiencies.

#### Q13.) What is the status of Union Negotiations related to MFT?

Management has concluded face to face negotiations with all three unions. With AFGE and NFFE 1804 (Detroit), we have a signed supplement. We are continuing to work with NFEE 1450 (Region IX) on several negotiability items and expect to have that process complete in coming weeks.

### Q14.) How much money will HUD save as a result of the modified plan for MFT? How does this compare to savings under the full transformation plan?

MFH's original plan for the transformation, which includes the consolidation of Asset Management operations, would generate significant savings of approximately \$60M per year, or \$550M over a 10-year period. Based on the modified version of the transformation directed by Congress, MFH will now save approximately \$15M annually or \$160M over a 10-year period. This is a decrease in savings of approximately 75% compared to the savings under MFH's original plan.

# Q15.) Why is HUD continuing to pursue consolidation of Asset Management as part of the FY2015 budget process?

Multifamily's inherited 54 office organizational structure is a lasting legacy of various attempts to decentralize and alter reporting structures within the organization. The structure is also a relic of the days when Multifamily performed more direct, day-to-day asset management. Today, Multifamily performs more wholesale than retail Asset Management, and works with organizations like the Real Estate Assessment Center (REAC) and Performance Based Contract Administrators (PBCAs) to carry out the majority of on-site activities, including physical inspections. This evolution of MFH away from on-the-ground asset management to more remote monitoring (enhanced by REAC contractors and PBCAs on the ground) makes it possible to move from the 54-office model to a more efficient state with 5 regions and 12 offices.

The efficiencies gained through consolidation of the offices do not come at the expense of good asset management practices. In fact, recent and proposed changes to Multifamily's Asset Management model strengthen Multifamily's ability to perform core work, even at a distance from where the assets are located. The evidence shows that MFH's peer organizations are able to successfully manage assets across the country with no more than 10-12 field offices, which is far fewer than Multifamily's 54 offices today. *Sustaining our Investments* introduced risk-based processing standards and a national problem-solving system to ensure that the greatest focus goes to the riskiest assets and that asset management activities are carried out uniformly nationwide. The

HQ Office of Asset Management also has a strong asset oversight group that performs monthly "watch list" calls, ensuring assets are managed effectively. To maintain close ties to HUD's communities, lenders, owners, and other stakeholders, Multifamily will train at least one representative from Field Policy & Management in each non-Core office to serve as a local liaison. HUD is committed to ensuring the availability of travel dollars to travel on-site when necessary.



### **Workload Sharing**

#### Q16.) What is workload sharing and how will it improve the work of Multifamily?

Workload Sharing is a program that will allow offices, teams, and managers to evenly distribute the Production and Asset Management workload across the country. When a particular office requires additional support due to a spike in volume, another office will be able to assist by sharing the workload.

Today, the work of Multifamily is distributed across offices in a manner that is imbalanced and unfair. Some hubs currently manage more than four times the Production workload and more than three times the Asset Management workload of other hubs. As a result, some hubs have experienced long queues, while others have been underutilized. Through workload sharing, the work of Multifamily will be distributed across the country in an equitable and balanced manner, and Multifamily will operate more efficiently and consistently. Workload Sharing is already being piloted in several hubs, and has received positive feedback from both employees and customers.

#### Q17.) What is the role of Alpine Companies and Summit LLC in facilitating MFT?

Alpine Companies Inc. and Summit LLC are third party vendors that have been contracted to support Wave 1 offices during the transformation by managing a small portion of the workload. The use of contractors is a temporary measure designed to ease the logistical challenges for Wave 1 employees going through the transition of a MFT wave. Upon completion of Wave 1, the workload will be returned to offices in the Fort Worth region.

#### Q18.) What is the scanning project and how does it relate to the MFT?

Multifamily is scanning all Asset Management files to Transaccess to facilitate workload sharing and to increase overall efficiency with the use of available technology. The scanning project will take place in the order of each of the five waves. In May, all of the scanning for Wave 1 was completed. The scanning process for Wave 2 is currently underway.



#### Account Executive Model

#### Q19.) What is the Account Executive Model?

The Account Executive Model will align the Asset Management portfolio according to staff expertise. Three different roles will be established under this model to manage assets based on the risk and complexity: Account Executive, Senior Account Executive, and Troubled Asset Specialist. Account Executives will be responsible for managing the non-troubled portfolio; Senior Account Executives will handle potentially troubled and more complex, non-troubled assets; and Troubled Asset Specialists will focus on Multifamily's most risky, complex, or troubled assets.

#### Q20.) How will the Account Executive Model improve the work of Multifamily?

By implementing specialized roles in Asset Management, Multifamily will improve the risk management process, increase its efficiency by aligning appropriate work with the relevant roles, and will facilitate clear paths for career development and opportunity for Asset Management employees.



#### **Underwriter Model**

#### Q21.) What is the *Underwriter Model* and Risk-Based Processing in Production?

The *Underwriter Model* will allow Multifamily to process and assign incoming applications based on risk and complexity. Applications that are riskier and more complex will be assigned to more experienced Underwriters who will individually oversee an end-to-end review of each application, continuing to draw in technical experts such as construction analysts and appraisers as needed. This process complements tools introduced in *Breaking Ground* like the Early Warning System, which allowed Production staff to rapidly identify applications that required further review by the submitter before being processed.

#### Q22.) How will the Underwriter Model improve the work of Multifamily?

Multifamily currently maintains a "one-size-fits-all" approach to Production, where all applications are assigned to a group rather than an individual, without consideration of an application's risk profile or employee expertise. Accordingly, no single person holds full responsibility for the application review or knowledge of its risk profile.

The Underwriter Model will improve the work of Multifamily by focusing expert attention on the most challenging applications to improve risk management, providing clear points of contact and streamlined processing to improve customer service, and increasing the overall efficiency of Multifamily's Production operations.



### Relocations / Reassignments

#### Q23.) What is the MFT Job Exchange program?

To mitigate the impact of relocations under MFT, OCHCO and Multifamily leadership have developed a job exchange pilot program to allow a Multifamily employee in a non-core office to exchange positions with another comparably qualified HUD employee in a different program area or in Asset Management in the same geographic location. The job exchange will run concurrent with each wave and will open approximately 6-8 weeks prior to the buyout window opening. The job exchange window for Wave 1 was completed on May 23<sup>rd</sup>, and the exchanges are expected to be finalized for Wave 1 on June 20<sup>th</sup>. Information for future waves will be forthcoming. For additional information about the job exchange, please visit the following link: http://hudatwork.hud.gov/po/arh/mftjobexchange.cfm.

#### **Q24.)** What is the MFT Resume Bank program?

The MFT Resume Bank is a temporary program designed to facilitate the placement of Multifamily employees impacted by the transformation into positions with other program offices in the same geographic location. The program allows other program office officials to identify specific vacancies for which they would like to consider qualified MFT impacted candidates. More information about the MFT resume bank program is available at the following link: http://hudatwork.hud.gov/po/arh/mftresumebank.cfm.

### Q25.) Will Asset Management employees who planned to relocate still have the ability to do so?

Yes. Paid voluntary relocation will be available to Asset Management employees who wish to relocate to a hub or core satellite office. Employees who choose to voluntarily relocate will do so along with the applicable wave based on the preference survey results.

#### Q26.) Is HUD offering relocation assistance to employees?

Yes, Multifamily is proposing a full relocation package for employees who accept directed reassignments or who choose to voluntarily relocate from a non-core office to a core office location. A national relocation guide is available at the following link: http://hudatwork.hud.gov/po/f/relocation/toc.cfm. GSA also provides significant information on federal relocation policies at the following link: http://www.gsa.gov/portal/category/21283. Employees can also contact the HUD Office of the Chief Financial Officer's Relocation and Travel Office for more information.

### Q27.) I am interested in relocating ahead of my wave. Will early relocation be an option for me?

In some situations, it may be possible for an early move to your targeted location, ahead of the Report to Duty date for your wave. For now, we only have relocation funding to accommodate those employees moving out of a non-core Wave 1 office or in to Fort Worth and Kansas City, and may only move you if a workstation is available. First priority is given to those who are required to relocate, though we may have seats available for those Asset Management employees who are voluntarily relocating as well. If you are interested in relocating early, please send an email to reassignment.mft@hud.gov, identifying your first preference location and include any supporting justification you have for the early move.

#### Q28.) Will we be asked to move to a new position if we are not being asked to relocate?

Many employees will be reassigned to a new position even if relocation is not involved. Reassignment will depend on your current position.

### Q29.) Will my current grade and step be transferred with me to the new position within my new office?

Yes. Your current grade and step will continue to apply and will not change due to your reassignment to a new position if you are asked to relocate.

# Q30.) If I am not eligible to retire, do not take a buyout, and decide to decline a directed reassignment to another local commuting area, what will occur? Will I be considered ICTAP-eligible when seeking other federal employment?

If a directed reassignment outside of the commuting area is declined, an involuntarily separation will be initiated. If an employee is involuntarily separated, programs such as ICTAP, CTAP, and/or severance pay will be offered based on program-specific eligibilities.

Additional details about eligibility are available at the following link, with ICTAP starting on page 15: http://www.opm.gov/policy-data-oversight/workforce-restructuring/employee-guide-to-career-transition/ctap\_guideline.pdf

#### Q31.) How do I submit a hardship application?

Per the Hardship Reassignment Handbook, HUD Handbook 650.1, the employee should submit a hardship reassignment request package to his or her immediate supervisor, using Form HUD-25060. The employee's immediate supervisor will forward the Hardship Request to the employee's Hub Director, who will then submit it to the Office of Housing Operations for review.

If the employee is submitting a Hardship Application to stay in their current duty station instead of relocating, the employee's hardship application will be reviewed and considered once the employee is determined to be impacted, i.e. when the employee receives his or her directed reassignment letter.

#### Q32.) When will I know what my position will be in the new model?

Employees will receive their new position when they receive their directed reassignment letter. Wave 1 employees should expect to receive these letters on June 30, 2014. The Field Resource Manual will also provide information about possible reassignments.

#### Q33.) How will my position be determined in the new model?

Employees will work in roles that make sense given the work they currently perform. While the job title may not be identical, and while some new training will be provided to get everyone up to speed, the new position should not be unfamiliar or in a completely new line of work. To get the right people in the right places, Multifamily plans to have individuals move into positions that most closely align with the work they currently perform.

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### Q35.) How are supervisory grades shifting under the new model, and how will reassignments take place for current GS-13 supervisors?

As part of MFT, there will be an increase in the number of non-supervisory GS-13 positions in Asset Management and Production. This reflects HUD's commitment to specialized positions with clear paths for employee advancement. As a result, all supervisory positions in the new model will be at the GS-14 level and above. Current GS-14 supervisors may be reassigned into these positions, and current GS-13 supervisors can choose to apply for these positions through merit staffing. If not selected for a GS-14 supervisory position, a current GS-13 supervisor will be reassigned into a GS-13 specialist position, such as Senior Underwriter, Senior Account Executive, or Troubled Asset Specialist. All employees, including supervisors, will retain their same grade and promotion potential after new model reassignments take place.

#### Q36.) Why doesn't MFT constitute a RIF?

The goal of the Multifamily Transformation is not to reduce the workforce. The intention is to balance the workload, improve the effectiveness of our models for underwriting and asset management, and create a streamlined organization that supports these goals. All employees are encouraged to remain with Multifamily during and after MFT. While it is possible that at the conclusion of MFT, we will see a reduction in the overall number of Multifamily employees, the purpose of MFT is not to reduce the number of Multifamily employees.



### Buyouts / VSIP / VERA

#### Q37.) Who will be eligible for a buyout?

OPM eligibility requirements specify that employees must meet certain eligibility requirements to receive a buyout. The requirements can be accessed here: http://www.opm.gov/policy-data-oversight/workforce-restructuring/voluntary-separation-incentive-payments/

#### To be eligible for a buyout, an employee must:

Be serving in an appointment without time limit;

- Be currently employed by the Executive Branch of the Federal Government for a continuous period of at least 3 years;
- Be serving in a position covered by an agency VSIP plan (i.e., in the specific geographic area, organization, series and grade);
- Apply for and receive approval for a VSIP from the agency making the VSIP offer; and
- Not be included in any of the ineligibility categories listed below.

#### Employees in the following categories are not eligible for a VSIP:

- Are reemployed annuitants;
- Have a disability such that the individual is or would be eligible for disability retirement;
- Have received a decision notice of involuntary separation for misconduct or poor performance;
- Previously received any VSIP from the Federal Government;
- During the 36-month period preceding the date of separation, performed service for which a student loan repayment benefit was paid, or is to be paid;
- During the 24-month period preceding the date of separation, performed service for which a recruitment or relocation incentive was paid, or is to be paid; and
- During the 12-month period preceding the date of separation, performed service for which a retention incentive was paid, or is to be paid.

### Q38.) How much time will employees have to consider relocation benefits, buyouts, and retirement?

The length of time for decision making will vary throughout the process depending on the options available to you. The standard time intervals allotted for each stage of the process are outlined below:

#### Buyouts:

- When an employee is notified that a buyout (VSIP) and early out (VERA) window is open, he/she will have 15 calendar days to submit applications for VSIP and/or VERA.
- Within 15 calendar days from submitting an application, employees will receive notice of their VSIP and/or VERA offers, if eligible.
- Once notified of their VSIP and/or VERA offers, employees will have 5 business days to accept or reject their buyout or early out offer.
- o If the employee accepts a buyout and/or early out, he/she will have up to **94 calendar days** to separate from the department after the last possible day to accept a buyout.

#### • Directed Reassignment Letters:

- Employees who receive a directed reassignment to either a new job and/or a new duty station will have two weeks to accept or decline their directed reassignment.
- Employees who accept their directed reassignment will have 90 days from the date the directed reassignment letter is delivered via email to report to duty at their new location.

#### • Training:

- For each wave, in-person training will be delivered after employees from consolidating offices have relocated to their future Regional Center or Satellite Office.
- The full training period will last **90 calendar days,** including **six to twelve weeks** of classroom training and subsequent on –the-job training in the new operating model.

### Q39.) Will the relocation package include a Homebuyers Program for employees who have to sell their homes if they're asked to relocate?

Unfortunately, HUD does not have a program to purchase your current home if you are unable to sell it. Only OIG is able to purchase homes. For more information please see the National Relocation Guide, available online at http://hudatwork.hud.gov/po/f/relocation/toc.cfm.

#### Q40.) If I choose to relocate and it proves unworkable, can I opt for a buyout?

Employees may only apply for the buyout window in which they are eligible. If you accept your directed reassignment and the Department incurred relocation costs to move you to your new office, you will not be eligible for a buyout for one year from the effective date of the relocation.

# Q41.) If the full plan for the transformation is approved in 2015, will asset management employees who remain in non-core offices receive another opportunity to apply for a buyout?

The impact of the FY2015 budget is not known at this time and management is unable to make any commitments based on speculative outcomes. However, if Asset Management employees were required to relocate in the future, management would explore the possibility of all options to support employees in the transition process.

#### Q42.) You mentioned up to \$25,000 buyouts. Is this the amount everyone will receive?

The regulation allows for up to \$25,000, but not everyone will receive the same amount. The amount of the buyout will be the lesser of an amount equal to severance pay or an amount determined by the Department head, not to exceed \$25,000. Performance is not a factor in the calculation of the buyout amount. More information is available at the following link: http://hudatwork.hud.gov/hudTransformation21/buyout.cfm

#### Q43.) If too many people choose the buyout, won't MFH be shorthanded?

To prevent staffing and workload concerns, MFT was carefully planned to take place in five waves over the course of two years, and we are implementing national Workload Sharing, which will ensure an even and fair distribution of workload across offices during the transformation. MFT will help Multifamily offices to operate with greater levels of consistency, less duplication, and streamlined processes for applications and asset servicing, which should allow us to do more work with the resources we have. We will ensure the new model is fully staffed through relocation, reassignment, merit staffing, or hiring.

### Q44.) If I did not receive an invitation to apply for the buyout, might I still be eligible for VERA?

Under OPM guidelines, the same requirements that apply for offering VSIP also apply to offering VERA. Therefore, if you did not receive the buyout invitation, you are not eligible to receive the VERA benefit at this time.

#### Q45.) What will the separation window be after the buyout window closes?

Buyout applicants will be notified within fifteen (15) days after the buyout window closes whether their application was approved. Employees must be off the rolls no later than 94 days after the last day to accept the buyout offer.

# Q46.) If I do accept a buyout offer, how long will I have to change my mind to stay with the Department?

Employees who accept a buyout offer may reverse their decision at any point up until the date that the employee separates from Federal employment.

