

## 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 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with 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. Cluster GS-1 to GS-10 (PWD) | Answer Yes |
| b. Cluster GS-11 to SES (PWD)  | Answer Yes |

In FY 2019, the percentage of PWD in the GS-1 to GS-10 cluster of the permanent workforce was 11.23%, a slightly lower rate than the expected 12% benchmark, indicating a trigger. PWD in the GS-11 to SES cluster of the permanent workforce participated at a rate of 6.23%, a lower rate than the expected 12% benchmark, indicating a trigger.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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.

- |                                 |            |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer Yes |
| b. Cluster GS-11 to SES (PWTD)  | Answer Yes |

In FY 2019, the percentage of PWTD in the GS-1 to GS-10 cluster of the permanent workforce was 1.07%, a slightly lower rate than the expected 2% benchmark, indicating a trigger. PWTD in the GS-11 to SES cluster of the permanent workforce participated at a rate of 1.31%, a lower rate than the expected 2% benchmark, indicating a trigger.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The Agency utilizes the EEOC's 12% and 2% benchmarks for PWD and PWTD, respectively, as targets. The Agency

communicates these goals and provides additional information on the hiring of PWD and PWTB as part of its efforts to encourage Program Offices to use Schedule A hiring authorities. The Agency also plans to re-establish a Disability Advisory Committee (ADAC) to assist with developing ideas for encouraging increased use of the Schedule A authorities and improving the participation rate for PWD and PTWD. Once re-established, the ADAC will work with the Office of Equal Employment Opportunity, Diversity, and Special Programs (EEO), the Office of Human Resources (OHR), and the Office of Human Capital Management (OCHM) to develop and implement a targeted recruitment plan. The Agency's OHR and OCHM will also be responsible for: (1) identifying suitable positions; (2) assisting in the recruitment of qualified disabled applicants; (3) expanding the use of the Schedule A process (where applicable); (4) assisting in the advertising of any mandatory or optional training programs; and (5) ensuring that the goals and requirements within Executive Order 13548 and Part J of the MD-715 Annual Report are communicated and implemented throughout the organization. ADAC members will also reinforce the Agency's core values in their respective areas by discussing the hiring program at staff meetings.

## 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 THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer No

During FY 2019, the duties and responsibilities of this function continued to be performed by OCHM and OHR's Employee and Labor Relations staff in collaboration with EEO. However, as part of the Agency's efforts at retooling the Disability Program, the Agency identified an OHR employee who will serve as the Reasonable Accommodation Coordinator (RAC) upon the implementation of the revised Reasonable Accommodation policy and procedures.

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 reasonable accommodation requests from applicants and employees	0	3	0	Vacant, Assistant Director, OHR, E&LR
Section 508 Compliance	0	2	0	william.kirkendale@csosa.gov
Architectural Barriers Act Compliance	0	2	0	Wikita Stegman, Director of Facilities wikita.stegman@csosa.gov reggie.jasmes@csosa.gov
Processing applications from PWD and PWTB	1	0	0	Karen Schmitz, Selective Placement Coordinator, OHR
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Karen Schmitz, Selective Placemen Coordinator, OHR

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Special Emphasis Program for PWD and PWTD	0	0	1	dwayne.marigny@csosa.go

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 that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer No

During FY 2019, members of the EEO staff and the Special Emphasis Program Manager for People with Disabilities received the following training with respect to their disability program duties: 1. EEOC Section 501 Affirmative Action Plan instructional guidance 2. Excel and FDR Training Conferences 2019 (MD-715 Disability and Reasonable Accommodation Track) 3. Mandatory EEO training on Reasonable Accommodation and the No FEAR Act. 4. EEOC’s Disability Program Management Training The Agency will continue to focus on providing training opportunities to the OHR employee who will serve as the Reasonable Accommodation Coordinator (RAC) upon the implementation of the revised Reasonable Accommodation policy and procedures.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer No

The Agency has identified an OHR employee who will serve as the RAC upon the implementation of the revised Reasonable Accommodation policy and procedures. Once the RAC begins processing requests, the Agency will be in a better position to assess what, if any, additional resources may be necessary.

**Section III: Program Deficiencies In The Disability Program**

<b>Brief Description of Program Deficiency</b>	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
<b>Objective</b>	Evaluate Agency’s current staffing, training, and funding levels to determine sufficiency for effectively managing the Reasonable Accommodation program.		
<b>Target Date</b>	Dec 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Nov 30, 2018	May 30, 2019	Review the staffing of the EEO Office to determine if a full-time and/or part-time FTE can be established to manage the Agency’s Reasonable Accommodation program.
	Dec 30, 2018	June 30, 2019	Review the staffing of the OHR Office to determine if a full-time or part-time FTE is available to perform duties of Disability Program Manager/ Reasonable Accommodation Coordinator.
	Dec 30, 2018	June 30, 2019	Identify the OHR position to serve as Reasonable Accommodation Coordinator in revised Reasonable Accommodation policy and procedures.
	Dec 30, 2018 Jan 30, 2019		Revise the Reasonable Accommodation policy and procedures. Once revised Reasonable Accommodation policy and procedures are implemented, begin the process of monitoring timeliness of responses to Reasonable Accommodation requests under the revised program.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	The Agency expects to complete this objective by the end of the fiscal year.	
	2019	The Agency completed the review of the staffing levels of EEO and OHR and identified the OHR position to serve as the Reasonable Accommodation Coordinator.	

<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
<b>Objective</b>	Review and revise the Agency's current Reasonable Accommodation policy and procedures to ensure compliance with EEOC guidance.		
<b>Target Date</b>	Jun 30, 2018		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 30, 2016	April 30, 2019	Discuss revision of current Reasonable Accommodation policy and procedures.
	Dec 31, 2016	November 30, 2019	Review proposed changes to policy and recommend changes to stakeholders.
	Jun 30, 2018	November 30, 2019	Vet policy and procedures with stakeholders for review and comment.
	Sep 30, 2019	June 10, 2020	Submit revised policy to EEOC to ensure compliance with EEOC guidance.
	Nov 29, 2019		Make recommended changes in accordance with EEOC's review, if applicable.
	Dec 1, 2019		Further revise policy to incorporate feedback and identify the Reasonable Accommodation Coordinator.
	Dec 31, 2019		Secure signatures from Directors of CSOSA and PSA.
	Apr 15, 2020	April 30, 2020	Vet further revised policy with stakeholders for review and comment.
	May 30, 2020	May 30, 2020	Revise to incorporate feedback.
	Aug 30, 2020		Post revised Reasonable Accommodation policy and procedures on Agency's intranet and internet sites.
Aug 30, 2020		Revise current Reasonable Accommodation training module.	
Sep 30, 2020		Schedule training on the new Reasonable Accommodation policy and procedures.	
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	The working group completed a draft on November 1, 2018, which was submitted for further review.	
	2020	The Agency expects to have the revised policy and procedures signed by the end of this fiscal year.	

<b>Brief Description of Program Deficiency</b>	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]
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<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
<b>Objective</b>	Process all reasonable accommodation requests in a timely manner.		
<b>Target Date</b>	Dec 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2019		Once revised Reasonable Accommodation procedures are implemented, designated Reasonable Accommodation Coordinator (RAC) will process all reasonable accommodation requests.
	Mar 30, 2019		Schedule training for supervisors on Reasonable Accommodation policy and procedures.
	Sep 20, 2019		Consult with OHR to discuss impediments to timely processing of all reasonable accommodation requests.
	Apr 30, 2020		Begin monitoring timeliness of request processing under revised program.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	The working group completed a draft on November 1, 2018, which was submitted for further review.	
	2020	The Agency expects to have the revised policy and procedures signed by the end of this fiscal year.	

<b>Brief Description of Program Deficiency</b>	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		
<b>Objective</b>	Establishing procedures for processing requests for PAS that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance and standards in accordance with 29 CFR §1614.203(d)(6).		
<b>Target Date</b>	Dec 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2018	June 30, 2020	Develop policy statement, guidelines and procedures for processing requests for Personal Assistance Services (PAS).
	Sep 30, 2019	June 30, 2020	Vet the PAS policy statement to various stakeholders for review and comments.
	Sep 30, 2019	July 13, 2020	Submit revised policy to EEOC to ensure compliance with EEOC guidance.
	Nov 29, 2019		Make recommended changes in accordance with EEOC’s review, if applicable.
	Dec 31, 2019 May 30, 2020	June 30, 2020	Secure signatures from Directors of CSOSA and PSA. Revise to incorporate feedback.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	A working group began drafting a Personal Assistance Services policy.	
	2019	Although a draft of policy was completed in FY 2019, the Agency decided to incorporate the Personal Assistance Services policy into the Reasonable Accommodation policy, which was undergoing revision.	

<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.		
<b>Objective</b>	Establish PAS procedures and post to the Agency’s intranet and internet.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	July 13, 2020	Submit revised policy to EEOC to ensure compliance with EEOC guidance.
	Nov 29, 2019		Make recommended changes in accordance with EEOC’s review, if applicable.
	Dec 1, 2019	May 30, 2020	Incorporate PAS policy and procedures into revised Reasonable Accommodation policy and procedures as much as possible, except create separate PAS procedures to define terms unique to PAS and to set forth any procedures that unique to PAS requests.
	Dec 31, 2019		Secure signatures from Directors of CSOSA and PSA.
	Apr 15, 2020	May 30, 2020	Vet PAS specific procedures with stakeholders for review and comment.
	May 30, 2020	June 30, 2020	Revise to incorporate feedback.
	Aug 30, 2020		Post revised combined policy and procedures on Agency’s intranet and internet sites.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	Although a draft of policy was completed in FY 2019, the Agency decided to incorporate the Personal Assistance Services policy into the Reasonable Accommodation policy, which was undergoing revision.	
	2020	The Agency expects the revised Reasonable Accommodation policy which will include the Personal Assistance Services policy, the Reasonable Accommodation procedures, and the PAS specific procedures to be signed and posted by the end of the fiscal year	

<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	Establish a process for implementing the Affirmative Action Plan for Individuals with Disabilities.		
<b>Target Date</b>	Oct 30, 2018		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 30, 2018		EEO, CSOSA’s OHR and PSA’s OHCM begin to formulate viable plans to implement the Affirmative Action Plan for Individuals with Disabilities.
	Oct 30, 2018		Explore the current usage of the Agency’s Schedule A database and identify methods or processes to increase usage of the database.
	Jan 30, 2019		Provide training to all hiring managers on the use of hiring authorities that take disability into account. Training should also include upward mobility strategies for PWD.
	Jan 30, 2019		When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A, 30% Disabled Veteran), create a standardized process for determining if the individual is eligible for appointment under such authority. If so, forward the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	The Agency had preliminary discussions.	
	2020	The Agency expects to continue these discussions into the next fiscal year.	

## 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 APPLICATIONS WITH DISABILITIES

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

Over the last fiscal year, even with limited resources, the Agency continued to utilize a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities. In FY 2019, the Agency was slightly below the 12% goal of PWD in the GS-1 to GS-10 cluster at 11.23%, and slightly below the goal of 2% of PWTD in the same cluster at 1.07%. Additionally, the Agency fell below the goals outlined in the final rule for senior grade level positions that have upward mobility into the senior grades. Agency senior grade levels were at 6.23% for PWD and 1.31% for PWTD. The Agency will implement the following multi-pronged and multi-year recruitment strategies in FY 2020, FY 2021, and FY 2022: a. Continue to target recruitment of People with Disabilities by reviewing and reinforcing the function of the OHR's Selective Placement Coordinator who has responsibility for the staffing and recruitment of People with Disabilities. With the assistance of the Agency's Disabled Veterans Affirmative Action Plan Manager (DVAAPM), the Agency will continue to partner with Virginia's and the District of Columbia's Vocational Rehabilitation Services and national organizations such as: o Disabled Veterans' Outreach Programs; o Disabled Transition Assistance Programs; o Disability Resource Centers at colleges and universities; and o CSOSA/PSA will explore the potential opportunities/resources of OPM's shared register for applicants with disabilities, designed by Bender Consulting Services. b. Continue its partnership with the Workforce Recruitment Program to recruit post-secondary students and recent graduates with disabilities who would be an ideal match for the mission of the Agency for temporary and permanent positions for which they qualify. c. Develop collaborative recruiting partnerships with community, academic and governmental groups that can reach individuals with targeted disabilities to maximize recruiting from all sources when filling positions at the GS-11 level and above, including managerial and supervisory positions at grades GS-13 to SES. d. Increase the Agency's presence at meetings, conferences, and career fairs sponsored by organizations serving individuals with targeted disabilities to reach a larger pool of potential candidates.

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

The Agency used all available hiring authorities to recruit and hire PWD and PWTD. Recruitment efforts included: o Use of the Workforce Recruitment Program. o Continued Partnership with the D.C. government's Department of Rehabilitative Services Administration (DRSA) to provide expanded opportunities for individuals with disabilities to gain access to meaningful employment with CSOSA and PSA. o Partnership with Operation War Fighter Internship Program and the Wounded Warrior Regiment M4Life Program o Continued involvement by PSA's management officials in the recruitment process of hiring persons with disabilities and use of PSA's contact and engagement with partners who specialize in hiring persons with disabilities.

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.

Through its talent acquisition system, Avue, the Agency connects with state disability agencies by sending job announcements in real-time when announcements are posted. The Agency's Selective Placement Coordinator receives communications from interested applicants who seek employment with CSOSA. Additionally, CSOSA continues to provide employees with disabilities with a multitude of training and developmental opportunities, which allow individuals to gain skills and competencies needed for the successful performance of their jobs, and to enhance their career opportunities.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer Yes

OHR and PSA’s Office of Human Capital Management informs hiring managers of the use of special hiring authorities that consider disability. Managers and supervisors receive formal and informal training during the year as part of the annual 8 hour mandatory EEO and Diversity training requirements. This training covers the special hiring authorities, hiring goals, reasonable accommodation programs, and diversity and inclusion topics.

**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.

The Agency maintains contact with organizations that assist PWD (including PWTD) with securing and maintaining employment. The Agency currently collaborates with the Wounded Warrior Regiment – Career Resources Management Center in Quantico, Virginia, the D.C. Department on Disability Services, and the Virginia Rehabilitation Services to provide disabled individuals real-life work experience. The Agency also collaborated with the D.C. Mayor’s Office of Veterans Affairs (MOVA) to assist Veterans filing VA Disability claims. Lastly, the Selective Placement Coordinator, along with various members of Special Emphasis Programs within the Agency, served as volunteer recruiters at various job fairs for People with Disabilities.

**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.

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

Using the goal of 2% for PWTD among the new hires for FY 2018, a trigger does exist. In FY 2018, we hired four (4) new hires with disabilities, but none of them identified as habing a targeted disability. As a result, we came no closer to meeting the 2% goal for PWTD as it relates to the EEOC’s benchmark

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

In FY 2018, we hired four (4) new hires with disabilities, but none of them identified as having a targeted disability. As a result, we came no closer to meeting the 2% goal for PWTD as it relates to the EEOC’s benchmark. However, it should be noted that the MCO in this Agency are Law Enforcement positions, which requires a certain degree of physical fitness and ability.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. Qualified Applicants for MCO (PWD) Answer Yes
  - b. Qualified Applicants for MCO (PWTD) Answer Yes

Using the relevant internal applicant pool for any of the mission-critical occupations, triggers continue to exist for PWD in series 0101, 0102 and 2210. For PWTD, the trigger continues to exist for all four mission-critical occupations. It should be noted that the MCO in this Agency are Law Enforcement positions, which require a certain degree of physical fitness.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. Promotions for MCO (PWD) Answer Yes
  - b. Promotions for MCO (PWTD) Answer Yes

Using the qualified applicant pool of employees promoted to any of the mission-critical occupations, triggers exist for PWD in series 0101, 0102 and 2210. For PWTD, the triggers continue to exist in all four mission-critical occupations. It should be noted that the MCO in this Agency are Law Enforcement positions, which require a certain degree of physical fitness.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### A. ADVANCEMENT PROGRAM PLAN

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

During FY 2020, the Agency plans to improve and strengthen its opportunities for advancement for PWD, including PWTD, utilizing the following initiatives: • Determine whether barriers exist for PWD and PWTD in the recruitment and/or selection process for the 0101, 0303, and 2210 occupational series. This data will be incorporated into CSOSA’s comprehensive recruitment plan, which is currently under development. The Agency is also open to expanding its contacts to include America Job Centers and employment network service providers. • Incorporate a plan to investigate a trigger involving the low participation rate of PWD in the major occupations into the responsible official’s performance plan. • Utilize additional sources of data to: (1) identify policies,

procedures, and practices that limit PWD’s employment opportunities; (2) investigate whether PWD are experiencing barriers that either prevent them from applying for and/or being selected for promotions or new hires to the senior grade levels; (3) identify the proportion of mission-critical occupations that lead to managerial positions, and if PWD have a low participation rate, conduct a focus group with the population to identify impediments to their advancement within the Agency; (4) examine whether any of our policies, procedures, and practices are motivating PWD to leave the Agency; (5) evaluate policies, practices and procedures surrounding reasonable accommodation requests, career development opportunities, job assignments, performance appraisals, awards, and the work environment; and (6) conduct climate assessment surveys, and focus groups. • Plan to investigate whether PWD and PWTD have barriers in recruitment and/or selection processes for new hires and promotions to senior grade levels and management positions as well as the distribution of awards. The Agency will also consider the use of details and job assignments as tools for PWD to obtain significant work experience. • Establish a plan to collect exit interview data by disability status and identify reasons PWD are leaving the Agency. The Agency will also plan to conduct stay-interviews to encourage PWD who may be considering leaving to stay.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

Employee training is encouraged and available through a variety of programs offered to all employees. Training promotes professional and personal development. Employees with disabilities are actively encouraged to apply to these developmental opportunities. Opportunities are advertised locally and through the Agency’s intranet. The Agency tracks employees selected for training and details through its established HR systems of record and has other mechanisms in place for limited tracking of employees selected for mentoring, fellowships, and coaching. Some of those career development opportunities are listed below: o CSOSA/PSA Shadowing and Mentoring programs o American Probation and Parole Association Leadership Program o Graduate School’s Aspiring Leader Program o Graduate School’s New Leader Program o Susan Shaffer Leadership Academy (PSA) o Graduate School’s Executive Potential Program o Graduate School’s Executive Leadership Program o Graduate School’s New Leader Program

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Fellowship Programs						
Detail Programs						
Mentoring Programs	26	26				
Coaching Programs	3	3				
Training Programs	11	11				
Other Career Development Programs	18	16				

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer Yes
- b. Selections (PWD) Answer Yes

The Agency data is unavailable for FY18 to determine triggers for all EEO groups. There is limited tracking information for PWD/PWTD. The current Learning Management System (LMS) for all employees, including PWD/PWTD, does not populate into workforce data tables A/B-12 Career Development Distributed by Disability. The Agency will enhance its capability to collect certain data. In FY19, we anticipate further development of the NFC personnel system to enable captured data to include PWD/PWTD.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer Yes
- b. Selections (PWTD) Answer Yes

The Agency data is unavailable for FY18 to determine triggers for all EEO groups. There is limited tracking information for PWD/PWTD. The current Learning Management System (LMS) for all employees, including PWD/PWTD, does not populate into workforce data tables A/B-12 Career Development Distributed by Disability. The Agency will enhance its capability to collect certain data. In FY19, we anticipate further development of the NFC personnel system to enable captured data to include PWD/PWTD.

**C. AWARDS**

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

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

In FY18, individuals with disabilities received awards at a comparable rate to other employees. For example, 7.22% of the CSOSA workforce identified as having a disability, and 7.29% of employees who received the highest cash awards also identified as having a disability.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

- a. Pay Increases (PWD) Answer No
- b. Pay Increases (PWTD) Answer No

The highest award that CSOSA provides is the Quality Step Increase (QSI), which was awarded to employees with disabilities at a much higher rate than the workforce as a whole. QSI’s comprise the vast majority of awards greater than \$500. In FY 18, three employees with disabilities received QSI’s, representing 11.5% of total QSI’s awarded. CSOSA employees who receive QSI’s are ineligible to also receive a performance award for the same performance year. Overall, the FY18 QSI and cash award totals indicate that employees with disabilities received a high percentage of top Agency awards.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

## D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes

The qualified internal applicant rate of 3.70% fell substantially below the relevant pool of 7.41%. However, the relevant pool includes all GS-13 employees, some of whom may not be qualified.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD)	Answer	No
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)	Answer	Yes
b. New Hires to GS-15 (PWD)	Answer	Yes
c. New Hires to GS-14 (PWD)	Answer	Yes
d. New Hires to GS-13 (PWD)	Answer	Yes

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWD among the new hires to the senior grade level, and the results of that analysis will be included in the FY 2019 Report.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)	Answer	Yes
b. New Hires to GS-15 (PWTD)	Answer	Yes
c. New Hires to GS-14 (PWTD)	Answer	Yes
d. New Hires to GS-13 (PWTD)	Answer	Yes

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWTD among the new hires to the senior grade level, and the results of that analysis will be included in the FY 2019 Report.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified

applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

b. Managers

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

c. Supervisors

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions, and the results of that analysis will be included in the FY 2019 Report.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

b. Managers

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions, and the results of that analysis will be included in the FY 2019 Report.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer Yes

- b. New Hires for Managers (PWD) Answer Yes
- c. New Hires for Supervisors (PWD) Answer Yes

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWD among the selectees for new hires to supervisory positions. The results of the analysis will be included in the FY 2019 Report.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTD) Answer Yes
- b. New Hires for Managers (PWTD) Answer Yes
- c. New Hires for Supervisors (PWTD) Answer Yes

The Agency is currently in the process of improving the analysis of the qualified applicant pool of PWTD among the qualified internal applicants and/or selectees for new hires to supervisory positions. The results of the analysis will be included in the FY 2019 Report.

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be 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 assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

There is no statistical data available during this reporting period to determine if the Agency converted any eligible Schedule A employees with disabilities. The Agency will endeavor to modify and retrieve this information from the personnel database in FY 2019

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

- a. Voluntary Separations (PWD) Answer No
- b. Involuntary Separations (PWD) Answer No

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

- a. Voluntary Separations (PWTD) Answer No
- b. Involuntary Separations (PWTD) Answer No

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

The Agency's exit survey is voluntary, and there was insufficient data collected during the reporting period to allow for analysis. Typically, the most common type of separation for both PWD and PWTD is voluntary retirement or accepted appointments in other federal agencies.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform 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.

The Agency's public website includes notice and an explanation of employees' and applicants' rights under Section 508 of the Rehabilitation Act, including instructions for filing a complaint, and can be found at [www.csosa.gov/disclaimers/accessibility.aspx](http://www.csosa.gov/disclaimers/accessibility.aspx)

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.

The Agency is currently revising its public website to include notice and explanation of employees' and applicants' right under the Architectural Barriers Act, including instructions for filing a complaint.

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.

The EEO, in collaboration with the Disability Employment Program Committee, is working with our Facilities Department to conduct an audit of all Agency's Field Offices to ensure that they are accessible to disabled persons.

**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.)

The Agency's current guideline for Reasonable Accommodation (RA) request processing is 60 days. Based on current Agency guidelines, 71% of RA requests were timely processed.

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.

All Managers and Supervisors are required to take EEO Refresher training every two years. This training includes models of reasonable accommodation.

## **D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

*Pursuant to 29 CFR §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 for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Agency is currently developing Personal Assistance Services (PAS) procedures and guidelines. The goal is to have the procedures vetted and posted in the fourth quarter of FY 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 governmentwide average?

Answer No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

There have been no findings of discrimination alleging harassment based on disability status during the last fiscal year.

### **B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer No

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

Answer 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.

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## 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?

Answer Yes

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

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Low Participation Rate of People with Disabilities in Core Occupations</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Given that CSOSA and PSA are a law enforcement agencies, the Agency is focused on the recruitment of persons with a broad range of abilities for a variety of positions.</p>							
<p><b>Objective</b></p>	<p>Increase the Number of Disabled Employees in Non-Mission-Critical positions such as Finance, Procurement, EEO, and OHR.</p> <table border="1" data-bbox="487 1018 779 1165"> <tr> <td><b>Date Objective Initiated</b></td> <td>Aug 30, 2019</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Dec 31, 2019</td> </tr> </table>				<b>Date Objective Initiated</b>	Aug 30, 2019	<b>Target Date For Completion Of Objective</b>	Dec 31, 2019
<b>Date Objective Initiated</b>	Aug 30, 2019							
<b>Target Date For Completion Of Objective</b>	Dec 31, 2019							
<p><b>Responsible Officials</b> Denise Clark, Linda Mays and Najuma Lake Director of EEO, CSOSA OHR and PSA OHCM</p>								
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>12/31/2019</p>	<p>Training for managers and supervisors.</p>	<p>Yes</p>	<p>12/30/2020</p>					
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></p>							
<p>2019</p>	<p>Thirty (30) percent of the managers and supervisors were trained on Reasonable Accommodation.</p>							

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

N/A

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

N/A

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve

the plan for the next fiscal year.

N/A
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