

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 No
- b. Cluster GS-11 to SES (PWD) Answer No

*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 No
- b. Cluster GS-11 to SES (PWTD) Answer No

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 goals are communicated from the Department of Homeland Security Strategic Recruitment, Diversity and Inclusion Division to the Coast Guard. The goals are then provided to Coast Guard recruiters, HR Operations Division, HR Specialists, etc. Monthly updates on the hiring goals are also provided to those that are involved with the hiring process.

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 Yes

The USCG has designated sufficient qualified personnel to implement its current disability program during the reporting period. However, in future years, USCG may need additional personnel to properly implement compliance relating to section 501 as well as expand the reasonable accommodation program.

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	
Architectural Barriers Act Compliance	28	0	0	
Answering questions from the public about hiring authorities that take disability into account	0	0	3	Colette.A.Pinkney@uscg.m
Processing reasonable accommodation requests from applicants and employees	5	0	0	Michael Brenyo Persons with Disabilities Program Manager CivilRightsRA@uscg.mil
Section 508 Compliance	1	1	0	Dr. Eleanor Thompson Branch Chief Section.508@uscg.mil
Special Emphasis Program for PWD and PWTDS	5	0	0	Michael Brenyo Civil RightsRA@uscg.mil Person with Disabilities Program Manager Civil RightsRA@uscg.mil
Processing applications from PWD and PWTDS	0	0	3	Joint collateral responsibilities depending on the methods the applications are received.

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 Yes

All USCG employees are required to undergo Civil Rights Awareness training on a triennial basis. In addition, USCG provides mandatory training to managers on hiring PWDs and PWTDS through the Cornerstone Leadership Training. USCG also provides training opportunities for managers and supervisors on providing reasonable accommodations. Lastly, USCG promotes “Schedule A” training available for supervisors through the Coast Guard’s automated learning management system. Coast Guard disability program staff attended the District of Columbia’s Department on Disability Services Disability Awareness session on “Persons Who Are Blind and Low Vision.” Additionally, Coast Guard disability staff attended the Transportation Security Agency’s TSA Talks on “The Impact of Unconscious Bias in the Workplace” addressing the importance of identifying unconscious bias by examining its impact on individuals, teams, office morale, and the workforce.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

USCG provides sufficient funding and other resources to successfully implement its disability program during the reporting period. USCG currently has partnerships with Department of Transportation, Computer Accommodations Program, and Disability Resource Center in order to provide funding, reasonable accommodations, and personal assistance services.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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.		
Objective	Provide guidance and resources necessary to ensure that the agency can process accommodation requests within the time frame set forth in its reasonable accommodation procedures, which is within 15 business days; share analyses with leadership, working groups and field staff to promote timeliness.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	September 30, 2019	Analyze late accommodation approvals to see if there is a common factor that can be addressed.
	Sep 30, 2019	September 26, 2019	Guidance regarding service animals provided.
	Oct 22, 2019	October 22, 2019	Meet with civil rights Regional Directors to discuss how to address late accommodations.
	Jan 7, 2020		Quarterly review of accommodation requests.
	Jan 31, 2020		Develop a Reasonable Accommodation Promotion Plan to educate the workforce and management officials about reasonable accommodation procedures and timeframe.
	Apr 7, 2020		Quarterly review of accommodation requests.
	Apr 30, 2020		Civil rights and human resources collaboration on guidance regarding the reassignment process.
	Aug 7, 2020		Quarterly review of accommodation requests.
	Aug 30, 2020		Obtain approval and implement the Reasonable Accommodation Promotion Plan.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	A review of late accommodation approvals found that they usually involved reassignment and service animals.	
	2019	Service animal guidance was disseminated to the civil rights staff and posted on the civil rights website.	
	2020	A meeting was held with the civil rights Regional Directors and timeliness regarding accommodation approval was addressed.	

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	Implement an adequate process that permits tracking of employee exit interviews/surveys feedback which is required by EEOC MD-715, Part G, Self-Assessment that requires that an Agency conduct exit interviews or surveys that includes questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of persons with disabilities? [See 29 CFR 1614.203(d)(1)(iii)(C)].		
Target Date	Jan 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Apr 30, 2019		Collaborate with DHS to develop questions to include in the exit survey that address how to improve the recruitment, hiring, inclusion, retention and advancement of persons with disabilities? (see 29 CFR 1614.203(d)(1)(iii)(C)).
	Sep 30, 2021		Provided the new DHS exit survey is issued by 30 September 2020, reviews of quarterly exit survey reports will be conducted during FY21 to identify continued challenges or improvements.
	Jan 30, 2022		One year from DHS' projected launch of the new exit survey (30 September 2020) analyze a full year of survey results in FY2021 to determine effectiveness and necessary improvements by 30 January 2022. In the interim, the additional questions required by MD 715 in exit surveys.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Coast Guard had a meeting with DHS Civil Rights Civil Liberties office on September 12, 2019 and they indicated that their office is working to update the exit survey to include questions that address how to improve the recruitment, hiring, inclusion, retention and advancement of persons with disabilities. This action is on-going.	

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.

The USCG establishes partnerships with IWD/IWTD diverse organizations such as Operation Warfighter (OWF). We participate in the Workforce Recruitment Program (WRP) by hiring college students with disabilities on a temporary basis for the summer. We also sponsor OWF internships for veterans with targeted disabilities. USCG uses the OPM Résumé Mining Tool to mine for resumes of candidates eligible to be hired under non-competitive hiring authorities such as Schedule A for disabilities and 30% or more compensable disabled veterans. USCG will continue to use the Workforce Recruitment Program (WRP) and Operation Warfighter (OWF) as potential sources to hire PWD/PWTDs.

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

Individuals requesting consideration as Schedule A persons with disabilities applicants are encouraged to apply for all USCG job openings that are posted. The vacancy announcements clearly communicate to all applicants how to apply using the Schedule A

authority or any other non-competitive authority such as 30% or more disabled veteran. Coast Guard hiring managers are encouraged to use the 30% or more disabled veterans and the Schedule A hiring authorities. Hiring managers may contact the CG Selective Placement Program Manager or the Veterans Program Manager to discuss hiring authorities and to develop recruitment strategies to hire persons with disabilities using the Schedule A and 30% or more disabled veterans hiring authority.

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.

Applicants who self-disclose their disability, provide the appropriate documentation, and are determined qualified for the position are referred to the selecting official with other non-competitive eligibles.

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

USCG provides mandatory training to managers on hiring PWDs and PWTDs through the Cornerstone Leadership Training. USCG also promotes "Schedule A" training. The Coast Guard's Office of Civilian Human Resources Operations conducted a series of training sessions for hiring managers on Civilian Hiring Authorities that included information on the Schedule A and 30% or more Disabled Veterans hiring authorities. Additionally, Coast Guard provides mandatory training to managers on hiring PWDs and PWTDs through the Cornerstone Leadership Training.

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.

USCG plans to continue to maintain partnerships with PWD/PWTD organizations (i.e. WRP, OWF, etc.). In addition, we will continue to educate managers on Schedule A hiring options. USCG will promote the CAP program to retain employees with disabilities. USCG will continue strengthening its relationship Gallaudet University by conducting information sessions and attending career fairs. Additionally, USCG will continue to use the WRP and OWF as sources to hire PWD/PWTDs. Coast Guard conducted a Pathways Program Information Session at Gallaudet University providing students with disabilities information on the Pathways Internship, Recent Graduates, and Presidential Management Fellows programs. Coast Guard will continue to build relationships with organizations and associations that support and assist PWD and PWTDs by attending career fairs, training sessions, and by conducting information sessions.

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 No

Among the new hires in the permanent workforce, a trigger does not exist for PWD (17.4%), which is above the benchmark of 12%, and a trigger does not exist for PWTD (3.7%), which is above the benchmark of 2%.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent	Temporary	Permanent	

	(#)	Workforce (%)	Workforce (%)	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 N/A
- b. New Hires for MCO (PWTD) Answer N/A

N/A USCG does not identify MCO for civilians. MCOs are military positions only. USCG only identifies major occupations.

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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

N/A USCG does not identify MCO for civilians. MCOs are military positions only. USCG only identifies major occupations.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

N/A USCG does not identify MCO for civilians. MCOs are military positions only. USCG only identifies major occupations.

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.

The CG has also recently stood up a Civilian Career Management Team tasked with further developing and advertising specific career based development opportunities and programs that are already in place or under development in various professional communities.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Office of Leadership offers DHS Leader development opportunities such as the DHS Mentoring Program, DHS SES CDP, OPM Federal Internal Coach Training Program, DHS Rotational Assignments and Joint Duty program. In addition, individual professional communities such as acquisitions and contracting, marine inspection etc. manage their own career development activities. These are areas where career ladders/career development tools and programs are in place.

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	NA	NA	NA	NA	NA	NA
Fellowship Programs	NA	NA	NA	NA	NA	NA
Mentoring Programs	NA	NA	NA	NA	NA	NA
Coaching Programs	NA	NA	NA	NA	NA	NA
Training Programs	NA	NA	NA	NA	NA	NA
Detail Programs	NA	NA	NA	NA	NA	NA
Other Career Development Programs	NA	NA	NA	NA	NA	NA

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 No
- b. Selections (PWD) Answer No

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 No
- b. Selections (PWTD) Answer 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) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

The benchmark for cash awards is 89%. The inclusion rate for PWD and PWTD was 79%. A trigger exists.

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

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 Yes

The benchmark for QSIs is 2.76%. The inclusion rate for PWTD was 2.49%.

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 N/A
 - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- c. Grade GS-14

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

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 N/A
 - ii. Internal Selections (PWTD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTD) Answer N/A
 - ii. Internal Selections (PWTD) Answer N/A
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Answer N/A
 - ii. Internal Selections (PWTD) Answer N/A
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer N/A
 - ii. Internal Selections (PWTD) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

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 N/A
- b. New Hires to GS-15 (PWD) Answer N/A
- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
- b. New Hires to GS-15 (PWTB) Answer N/A
- c. New Hires to GS-14 (PWTB) Answer N/A
- d. New Hires to GS-13 (PWTB) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

5. Does your agency have a trigger involving PWB 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 (PWB) Answer N/A
 - ii. Internal Selections (PWB) Answer N/A
- b. Managers
 - i. Qualified Internal Applicants (PWB) Answer N/A
 - ii. Internal Selections (PWB) Answer N/A
- c. Supervisors
 - i. Qualified Internal Applicants (PWB) Answer N/A
 - ii. Internal Selections (PWB) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer N/A
- b. Managers
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer N/A
- c. Supervisors

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

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

- 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 N/A
 - b. New Hires for Managers (PWD) Answer N/A
 - c. New Hires for Supervisors (PWD) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

- 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 N/A
 - b. New Hires for Managers (PWTD) Answer N/A
 - c. New Hires for Supervisors (PWTD) Answer N/A

The Coast Guard is working with its stakeholders to capture the required data and may have to provide it in an alternative format.

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

The Coast Guard converted three Schedule A employees with a disability in FY 2019. The Selective Placement Program Coordinator (SPPC) will monitor and send a list of Schedule A employees eligible for conversion to the Office of Civilian Human Resources Operations, CG-123 for subsequent dissemination to management. The SPPC will begin sending the list at the end of each quarter effective 2nd Quarter, June 30, 2020.

- 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 Yes
 - b. Involuntary Separations (PWD) Answer Yes

The voluntary separation inclusion rate for PWD is 9.2% compared to 7.8% for persons without disabilities. The involuntary separation inclusion rate for PWD is 0.4% compared to 0.3% for persons without disabilities.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
-------------	---------	---------------------------	-----------------------------------

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 Yes
 - b. Involuntary Separations (PWTD) Answer Yes

The voluntary separation inclusion rate for PWTD is 9.7% compared to 7.8% for persons without disabilities. The involuntary separation inclusion rate for PWTD is 0.6% compared to 0.3% for persons without disabilities.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
-------------	---------	-------------------------	---------------------------------

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.

CG continues to collaborate with DHS to develop new questions to improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities. The collaboration will also address DHS providing exit interview data to each component which will allow the tracking of voluntary and involuntary separations for both PWD and PWTD. Once DHS provides the exit interview information, it should eliminate CG’s inability to track exit interviews data and provide the data need to respond to V.A.2 and V.A.3. (See Part H, FY19 MD-715 Report)

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 internet address is as follows: <https://www.uscg.mil/access/>.

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 internet address is as follows: <https://www.uscg.mil/Resources/Civil-Rights/Equal-Employment-Opportunity-Laws-Statutes-and-Regulations/>.

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.

USCG is currently in the process of implementing and evaluating its 504 compliance plan USCG-wide. USCG is continuing to explore the possibility of adopting a new RA database. USCG is currently soliciting feedback and finalizing guidance documents to

address areas of improvement and anticipates releasing them in FY20.

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.)

USCG processed accommodation requests in an average of 23.13 days in FY 2019. The average processing time was 15.8 days in FY 2018. This represents an increase of 47%. This is can be explained by the greater awareness of reasonable accommodation procedures and the desire to use reassignment and service animals as an accommodation, which can be a lengthy process. USCG is currently working on streamlining and increasing the efficiency of the reassignment process and anticipates an improvement in FY2020. Guidance regarding service animal related accommodations have been developed and provided as of Fourth Quarter, FY19.

- 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.

USCG continues to explore improving effectiveness by adopting a new RA database. USCG plans to have its request and funding approved by Fourth Quarter, FY 2020. USCG is also continuing to update and evaluate its policies and procedures to improve efficiency and clarity.

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.

USCG has its RA and PAS procedures available on its website. USCG is currently training the workforce on its updated RA and PAS procedures. RA and PAS are currently being tracked by USCG. USCG currently has a partnership with the Disability Resource Center which allows for PAS and RA at no cost to the Agency. USCG has placed its updated PAS procedures in its manual as of June 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 Yes

- 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 were no findings of discrimination alleging harassment based on disability status.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer Yes

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.

There were no findings of discrimination involving the failure to provide a reasonable accommodation.

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>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>The percentage of formal complaints alleging harassment based on disability in FY17 was 17.2%. This percentage was lower than the government-wide average of 18.1% in FY17. In FY18, the percentage of PWD filing a formal EEO complaint alleging harassment decreased to 15.1%. This percentage was lower than the government-wide average of 19.7% in FY18. During FY19, the percentage of these type of complaints increased to 24.5%. The government-wide average is not available for FY19.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Lack of sufficient training and education among employees and management has resulted in a misunderstanding of how to properly handle PWD. This creates conflict which may result in the filing of formal complaints.</p>							
<p>Objective</p>	<p>Educate all employees and management on how to properly address issues that may arise with PWD.</p> <table border="1" data-bbox="483 926 649 1066"> <tr> <td>Date Objective Initiated</td> <td>Jan 1, 2018</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Mar 31, 2018</td> </tr> </table>				Date Objective Initiated	Jan 1, 2018	Target Date For Completion Of Objective	Mar 31, 2018
Date Objective Initiated	Jan 1, 2018							
Target Date For Completion Of Objective	Mar 31, 2018							
<p>Responsible Officials</p>	<p>Michael Brenyo Persons with Disabilities Program Manager</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>07/31/2018</p>	<p>Review complaint activity to see if the number of PWD alleging harassment have decreased, review and revise training as required.</p>	<p>Yes</p>	<p>09/30/2018</p>	<p>09/30/2018</p>				
<p>02/28/2018</p>	<p>Create and receive approval for a training module that can be integrated into the Civil Rights Awareness training that address harassment in the workplace related to disability and how to appropriately address issues.</p>	<p>Yes</p>		<p>02/21/2018</p>				
<p>03/31/2018</p>	<p>Integrate training module and provide training to all employees.</p>	<p>Yes</p>		<p>02/21/2018</p>				
<p>02/28/2018</p>	<p>Reaffirm commitment to training and information sharing. Schedule regular training for Agency employees.</p>	<p>Yes</p>		<p>02/28/2019</p>				
<p>07/31/2019</p>	<p>Review complaint activity to see if the number of PWD alleging harassment have decreased, review and revise training as required.</p>	<p>Yes</p>		<p>07/31/2019</p>				
<p>03/01/2019</p>	<p>Conduct mid-year review of harassment based complaints. Address concerns or issues as required.</p>	<p>Yes</p>		<p>03/01/2019</p>				
<p>08/01/2019</p>	<p>Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.</p>	<p>Yes</p>		<p>08/01/2019</p>				
<p>03/01/2020</p>	<p>Conduct mid-year review of harassment based complaints. Address concerns or issues as required.</p>	<p>Yes</p>						
<p>08/01/2020</p>	<p>Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.</p>	<p>Yes</p>						
<p>08/30/2020</p>	<p>Complete a written analysis of reviews conducted thus far and provide outcomes and recommendations.</p>	<p>Yes</p>						

Fiscal Year	Accomplishments
2019	PWDPM provided training to 15 human resources personnel regarding accommodation process and procedure.
2019	Inter-departmental working group established to address issues that overlap civil rights, human resources, and the legal department.
2018	Began training workforce on new RA and PAS procedures as of 09/18/2018. PWDPM trained 28 employees and approximately 50 civil rights staff members. Civil rights staff conducts regular training with workforce.
2019	Reviewed complaint activity.
2018	Completed training slides for new CRA module.
2018	Reviewed complaint activity.
2019	Civil Rights Manual updated with new RA and PAS procedures.

<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>The percentage of formal complaints alleging failure to provide reasonable accommodation in FY17 was 12.1%. This percentage was lower than the government-wide average of 12.5% in FY17. In FY18, the percentage of PWD filing a formal EEO complaint alleging failure to provide a reasonable accommodation increased to 18.9%. This percentage was higher when compared to the government-wide average of 13.5% in FY18. The percentage of these type of complaints for FY19 was 18.4%. The government-wide average for FY19 is not available.</p>				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>				
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Lack of sufficient training and education among employees and management has resulted in a misunderstanding of how to properly handle reasonable accommodations. This creates conflict which may result in the filing of formal complaints.</p>				
<p>Objective</p>	<p>Educate all employees and management on how to properly address situations that may arise out of reasonable accommodation requests.</p> <table border="1" data-bbox="440 947 1503 1094"> <tr> <td data-bbox="440 947 651 1010">Date Objective Initiated</td> <td data-bbox="651 947 1503 1010">Jan 1, 2018</td> </tr> <tr> <td data-bbox="440 1010 651 1094">Target Date For Completion Of Objective</td> <td data-bbox="651 1010 1503 1094">Feb 28, 2018</td> </tr> </table>	Date Objective Initiated	Jan 1, 2018	Target Date For Completion Of Objective	Feb 28, 2018
Date Objective Initiated	Jan 1, 2018				
Target Date For Completion Of Objective	Feb 28, 2018				
<p>Responsible Officials</p>	<p>Michael Brenyo Persons with Disabilities Program Manager</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
02/28/2018	Create and receive approval for a training module that can be integrated into the Civil Rights Awareness training that address accommodations in the workplace and how to appropriately handle them.	Yes		02/21/2018
07/31/2018	Review complaint activity to see if the number of PWD alleging failure to accommodate have decreased, review and revise training as required.	Yes	09/30/0018	09/30/2018
02/28/2018	Reaffirm commitment to training and information sharing. Schedule regular training for Agency employees.	Yes		02/28/2019
07/31/2019	Review complaint activity to see if the number of PWD alleging failure to accommodate have decreased, review and revise training as required.	Yes		07/31/2019
03/01/2019	Conduct mid-year review of accommodation based complaints. Address concerns or issues as required.	Yes		03/01/2019
08/01/2019	Conduct near end-of-year review of accommodation based complaints and continue to address issues as they become apparent.	Yes		08/01/2019
03/01/2020	Conduct mid-year review of harassment based complaints. Address concerns or issues as required.	Yes		
08/01/2020	Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.	Yes		
08/30/2020	Complete a written analysis of reviews conducted thus far and provide outcomes and recommendations.	Yes		
03/31/2018	Integrate training module and provide training to all employees.	Yes		02/21/2018
Fiscal Year	Accomplishments			
2018	Began training workforce on new RA and PAS procedures as of 09/18/2018. PWDPM trained 28 employees and approximately 50 civil rights staff members. Civil rights staff conducts regular training with workforce.			
2018	Reviewed complaint activity.			
2019	Civil Rights Manual updated with new RA and PAS procedures.			
2019	Reviewed complaint activity.			
2019	PWDPM provided training to 15 human resources personnel regarding accommodation process and procedure.			
2018	Completed training slides for new CRA module.			
2019	Inter-departmental working group established to address issues that overlap civil rights, human resources, and the legal department.			

<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>During FY19, the benchmark for cash awards is 89%. The inclusion rate for PWD and PWTD was 79%.</p>			
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>			
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Conduct further analysis in FY20.</p>			
<p>Objective</p>				
<p>Responsible Officials</p>	<p>Colette Pinkney Selective Placement Program Coordinator</p>			
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>
<p>Fiscal Year</p>	<p>Accomplishments</p>			

<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>During FY19, the voluntary separation inclusion rate for PWTB is 9.7% compared to 7.7% for persons without disabilities.</p>		
<p>STATEMENT OF BARRIER GROUPS:</p>		<p><i>Barrier Group</i></p>		
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Conduct further analysis in FY20.</p>		
<p>Objective</p>				
<p>Responsible Officials</p>		<p>Colette Pinkney Selective Placement Program Coordinator</p>		
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>
<p>Fiscal Year</p>	<p>Accomplishments</p>			

<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>During FY19, the involuntary separation inclusion rate for PWTD is 0.6% compared to 0.3% for persons without disabilities.</p>			
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>			
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Conduct further analysis in FY20.</p>			
<p>Objective</p>				
<p>Responsible Officials</p>	<p>Colette Pinkney Selective Placement Program Coordinator</p>			
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>
<p>Fiscal Year</p>	<p>Accomplishments</p>			

<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>During FY19, conversion of all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service.</p>			
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>			
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</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>Conduct further analysis in FY20.</p>			
<p>Objective</p>				
<p>Responsible Officials</p>				
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>
<p>Fiscal Year</p>	<p>Accomplishments</p>			

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?		The benchmark for QSIs is 2.76%. The inclusion rate for PWTD was 2.49%.		
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Targeted Disabilities		
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.				
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.		Awards distribution.		
Objective		Increase the inclusion rate for QSIs for PWTD to meet or exceed the rate of those without disabilities.		
		Date Objective Initiated	Jun 30, 2020	
		Target Date For Completion Of Objective	Jun 30, 2021	
Responsible Officials		TBD TBD		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
08/30/2020	TBD	Yes		
Fiscal Year	Accomplishments			

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

Barrier #1 and Barrier #2: All activities were completed in a timely manner.

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

Barrier #1 and Barrier #2: By more fully educating employees and managers on their obligations and responsibilities related to the RA and PAS process, it helps to eliminate possible areas of conflict which may develop. It ensures a more collaborative and solution based approach to requests. A review of complaint activity has helped identify possible areas of improvement. The updated civil rights manual should help address some difficulty related to the accommodation process. One of the inter-departmental working group's goals is to address accommodation related issues before they become more serious.

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.

Barrier #1: It is possible that as more individuals become aware of their rights and options regarding harassment based on disability, the number of complaints as a percentage may rise in the short term. USCG will continue to provide training and information to employees and managers to further educate them on the RA and PAS process. Barrier #2: There is still a trigger because it exceeds the government-wide average. USCG will continue to provide training and information to employees and managers to further educate them on the RA and PAS process. Feedback from the employees/managers and the complaints themselves will be analyzed to develop possible ways through which the trigger can be improved.