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   Yes

Yes. ITA has a trigger with cluster GS-11 to SES (PWD). ITA plans to expand use of programs and available resources for finding qualified persons with disabilities and specifically for jobs in ITA's mission critical occupations, e.g., 1101, 1140, 1801s job series. Outreach to applicants with disabilities will include reaching out to institutions such as America Job Centers, State Vocational rehabilitation Agencies, and the Veterans' Vocational Rehabilitation and Employment Program. In addition, ITA has already implemented several developmental leadership programs in FY 2019. ITA plans on promoting these programs to current employees with disabilities as a means to support opportunities for this sector of the workforce to develop the skills and competencies needed for consideration into higher grades and positions.

*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   Yes

Yes. ITA has a trigger with cluster GS-11 to SES (PWTD). Using the same approach as with PWD, ITA plans to expand use of programs and available resources for finding qualified persons with disabilities and specifically for jobs in ITA's mission critical occupations, e.g., 1101, 1140, 1801s job series. Outreach to applicants with disabilities will include reaching out to institutions such as America Job Centers, State Vocational rehabilitation Agencies, and the Veterans' Vocational Rehabilitation and Employment Program. In addition, ITA has already implemented several developmental leadership programs in FY 2019. ITA plans on promoting these programs to current employees with disabilities as a means to support opportunities for this sector of the workforce to develop the skills and competencies needed for consideration into higher grades and positions.

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

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

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

> Throughout the year managers receive consultation from the ITA Human Capital office regarding the Department of Labor's Workforce Recruitment Program (WRP) and possible opportunities for Schedule A candidates searching for jobs. Going forward we will be providing the numerical goals to supervisors.

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

> ITA currently does not have staff resources dedicated solely to implementing a disability program. However, the agency works collaboratively with the EEO Officer and the Department's Office of Civil Rights to leverage existing resources to manage this effort.

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	0	1	0	Eugene Altermatt, Office of Facilities & Environmental Quality EAltermatt@doc.gov
Answering questions from the public about hiring authorities that take disability into account	0	1	0	Charles Clark, Director HC OHRM cclark@doc.gov
Section 508 Compliance	0	0	0	Jennifer Jessup, Office of Chief Information Officer JJessup@doc.gov
Processing applications from PWD and PWTD	0	1	0	Charles Clark, Director HC OHRM cclark@doc.gov
Special Emphasis Program for PWD and PWTD	0	1	0	Monique Dismuke, Office of Civil RIghts MDismuke@doc.gov

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	1	0	Laura Soria, EEO Spec, Office of Civil Rights lsoria@doc.gov

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

Answer   Yes

ITA currently does not have staff resources dedicated solely to implementing a disability program. The Office of Civil Rights staff who serves in this capacity have attended a variety of training on reasonable accommodation, and disability related laws and regulations.

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

ITA currently does not have staff resources dedicated solely to implementing a disability program. However, the agency works collaboratively with the EEO Officer and the Department's Office of Civil Rights to leverage existing resources to manage this effort.

Section III: Program Deficiencies In The Disability Program

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	In FY 2019, ITA intended to implement an exit survey/strategy		
Target Date	Dec 30, 2019		
Completion Date			
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Dec 30, 2020		Review results of Department initiated Retention Survey which ITA employees participated in to determine: - what issues affect employees remaining in the organization; or - consider leaving the organization. Determine if there is a need for an exit survey
Accomplishments	*Fiscal Year*	*Accomplishment*	

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.

ITA continues its use of programs and available resources for finding qualified persons with disabilities and specifically for jobs in ITA's mission critical occupations, e.g., 1101, 1140, 1801s job series. Outreach to applicants with disabilities includes reaching out to institutions such as America Job Centers, State Vocational rehabilitation Agencies, and the Veterans' Vocational Rehabilitation and Employment Program.

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

ITA uses and will expand the use of programs and available resources for finding qualified persons with PWD and PWTD in specifically jobs within ITA's mission critical occupations, e.g., 1101, 1140, 1801s job series. Outreach and expansion to applicants with disabilities will include reaching out to institutions such as America Job Centers, State Vocational rehabilitation Agencies, and the Veterans' Vocational Rehabilitation and Employment Program.

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 our HR servicing provider, when persons with disabilities apply to job announcements posted on USAJOBS, HR prepares separate merit certs for Schedule A applicants where managers can review applications/resumes and consider these applicants. ITA also receives unsolicited resumes from Schedule A people who express interest in employment when learning about ITA via the OPM Selective Placement Program Coordinator (SPPC). ITA shares these resumes with hiring managers' consideration for positions that might be vacant and works with our servicing HR provider to certify their eligibility.

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

Yes. Annually, managers are required to complete the "A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities".

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.

ITA casts the widest net to attract PWD/PWTD first by its presence on the OPM website and identifying a point of contact as the Selective Placement Program Coordinator (SPPC). Additionally, all ITA's job opportunity announcements on USAJOBS contain the proper language to promote the agency and attract persons with disabilities. ITA also utilizes outreach efforts and plans to expand these efforts to attract applicants with disabilities will include reaching out to institutions such as America Job Centers, State Vocational rehabilitation Agencies, and the Veterans' Vocational Rehabilitation and Employment Program.

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

Yes. In FY 2019 the goals of 12% for PWD were met (18.89%) but PWTD were not met. ITA will continue to encourage hiring managers to consider qualified PWD/PWTD. ITA hopes that through expansion of outreach ITA can increase the number of hires with PWD/PWTD in FY 2020. The difference between hiring and the goal for PWTD was .75% (Goal: 2%, actual: 1.25%)

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

Yes. Triggers exist in cluster GS-11 to SES for PWD/PWTD in MCOs.

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

Yes. PWD and PWTD did not reach the 12% and 2% benchmarks for internal applicants in MCOs in FY 2019

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

Yes. PWD and PWTD did not reach the 12% and 2% benchmarks for internal applicants in MCOs in FY 2019

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.

In FY 2018, ITA implemented several developmental leadership programs and career enhancing programs. Programs include a Coaching (…become a Coach, be a Coachie) for employees in grades GS-5 to SES, Rotation opportunities and Project Share for all ITA employees to perform work in other offices and jobs to gain exposure to new work and assist them to develop and acquire skills in areas outside their own job occupation. In addition, in early FY 2019, ITA implemented a mandatory training/ developmental curriculum for existing supervisors and new supervisors. The ITA Supervisory Curriculum is housed in the Commerce Learning Center (CLC). The curriculum is designed to teach, refresh and expand the current skills for supervisors. ITA plans on making the supervisory curriculum available to any employee who aspires to advance and become a supervisor. Expansion is a means of promoting and preparing employees for possible career advancement within the agency via competition when positions become open or where employees can leverage these programs/curricula for other opportunities in other agencies. ITA plans to continue marketing and promoting of these programs to current employees with disabilities (PWD/PWTD) for this sector of the workforce to develop the skills and competencies needed for consideration into higher grades and positions.

B. CAREER DEVELOPMENT OPPORTUNITES

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

In FY 2018, ITA implemented several developmental leadership programs and career enhancing programs. Programs include a Coaching (…become a Coach, be a Coachie) for employees in grades GS-5 to SES, Rotation opportunities and Project Share for all ITA employees to perform work in other offices and jobs to gain exposure to new work and assist them to develop and acquire skills in areas outside their own job occupation. In addition, in early FY 2019, ITA implemented a mandatory training/ developmental curriculum for existing supervisors and new supervisors. The ITA Supervisory Curriculum is housed in the Commerce Learning Center (CLC). The curriculum is designed to teach, refresh and expand the current skills for supervisors. ITA plans on making the supervisory curriculum available to any employee who aspires to advance and become a supervisor. Expansion is a means of promoting and preparing employees for possible career advancement within the agency via competition when positions become open or where employees can leverage these programs/curricula for other opportunities in other agencies. ITA plans to continue marketing and promoting of these programs to current employees with disabilities (PWD/PWTD) for this sector of the workforce to develop the skills and competencies needed for consideration into higher grades and positions.

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 (%)
Fellowship Programs						
Coaching Programs						
Other Career Development Programs						
Mentoring Programs						
Internship Programs						
Detail Programs						

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs						

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   N/A

      b. Selections (PWD)   Answer   N/A

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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   N/A

      b. Selections (PWTD)   Answer   N/A

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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

Of 955 total awards in FY19, 57 went to a PWD (5.9%) which 12 were to PWTD. (1.3%). The trigger would be 6.1% for PWD and .7% for PWTD.

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

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   Yes

          ii. Internal Selections (PWD)   Answer   Yes

      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

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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   Yes

    ii. Internal Selections (PWTD)   Answer   Yes

b. Grade GS-15

    i. Qualified Internal Applicants (PWTD)   Answer   Yes

    ii. Internal Selections (PWTD)   Answer   Yes

c. Grade GS-14

    i. Qualified Internal Applicants (PWTD)   Answer   Yes

    ii. Internal Selections (PWTD)   Answer   Yes

d. Grade GS-13

    i. Qualified Internal Applicants (PWTD)   Answer   Yes

    ii. Internal Selections (PWTD)   Answer   Yes

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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

> Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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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   Yes

          ii. Internal Selections (PWD)   Answer   Yes

      b. Managers

          i. Qualified Internal Applicants (PWD)   Answer   Yes

          ii. Internal Selections (PWD)   Answer   Yes

      c. Supervisors

          i. Qualified Internal Applicants (PWD)   Answer   Yes

          ii. Internal Selections (PWD)   Answer   Yes

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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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

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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

Due to multiple data issues resulting from changes in the EEOC's FY19 workforce data tables, the agency is unable to conduct applicant flow data analysis for FY19. The data tables contain multiple inconsistencies when analyzing internal selections, interviewed applicants, internal applications, and others. DOC/OCR is working with relevant stakeholders (Data Analytics, Monster, and NFC) to address these issues.

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   Yes

Yes, all Schedule A appointments at the end of their two-year appointment were converted to a permanent career-conditional or career appointment.

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

Seperations	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   No

      b.Involuntary Separations (PWTD)   Answer   No

Seperations	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.

Separations of PWD/PWTD did not exceed that of people without disabilities.

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.

See, https://www.commerce.gov/about/policies/accessibility

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 Department, ITA's parent organization, does not currently have information about employee's and applicant's rights under the ABA posted on its public website. However, the Department's Office of Civil Rights advises that efforts are underway to address this.

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 majority of ITA staff are located at the Herbert C. Hoover Building (HCHB) in downtown Washington, DC. Currently, HCHB is undergoing a multi-year major renovation that includes changes to improve accessibility in office spaces, bathrooms, conference rooms, etc., in accordance with ABA standards.

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.)

FY 19 average response time for ITA's Reasonable Accommodation requests was 7.75 days - representing a significant improvement in the average 17 days it took to respond to these requests in FY 2018.

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.

The responsibility for processing ITA's RA requests is handled by the Department's Office of Civil Rights (OCR). This ensures more timely responses and focused resources in this area. OCR Disability staff conducted training on reasonable accommodations at the main DOC headquarters in FY 2019, and were available in person and online via WebEx. OCR's RA staff reported that RA requests that were delayed for more than 20 days were delayed due to the employee submitting medical documentation. When requests were approved, they were implemented within 10 days of approval or request. ITA's RA Coordinator has a system in place for tracking all requests and routinely reports to senior leadership on data trends, costs and timeliness.

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.

There have been no requests for PAS since the requirement was implemented in 2017. However, DOC RA training available to all ITA employees includes procedures for requesting and responding to request for PAS.

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.

N/A

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

   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.

n/a

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

   Answer   No

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

   Answer   N/A

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

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?	PWD and PWTD - Low Participation Rate

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	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.	ITA senior leaders hosted the DOC Office of Civil Rights Policy & Evaluation Team who presented ITA's diversity statistics and data to senior leaders to assist them in making more informed hiring decisions. During this briefing/ presentation, the numerical benchmark goals of 12% for PWD and 2% for PWTD and the HR hiring flexibility authority for Schedule A were discussed.

Objective	Increase awareness and use of hiring flexibilities, such as Schedule A, to reach the benchmark of 12%/2%.
Date Objective Initiated	Oct 1, 2017
Target Date For Completion Of Objective	Sep 30, 2020
Responsible Officials	Ruben Pedroza Director

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Conduct trainings and marketing of special hiring authorities (e.g., Schedule A) to ITA managers to increase awareness and promote the use of these authorities.	Yes		

Fiscal Year	Accomplishments
2019	Our recruiting efforts in providing managers increased awareness with special hiring authorities (Schedule A, Workforce Recruitment Program, etc) is already paying off. In FY19, 18.89% of ITA's new hires were PWD which is moving us toward the goal of 12%/2%. We are still not yet there, but we will continue to partner with managers and market these hiring programs.

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

As a small agency, ITA continues to have challenges with resources to dedicate exclusively to affirmative employment program efforts. However, it understands the importance of this area and will continue to find collaborative ways to leverage existing resources to increase parity with all employee groups.

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

ITA hopes that the implementation in FY19 of developmental programs will also benefit PWD/PWTD and will begin to show improvement going forward.

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.

ITA hopes that the implementation in FY19 of developmental programs will also benefit PWD/PWTD and will begin to show improvement going forward.