

## 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

No additional comment.

\*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

No comment.

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 Office of Recruitment, Hiring, Staffing, & Placement presents and reviews the goals for the approaching fiscal year, as part of the annual recruitment kick-off meeting. The goals are also included on the daily hiring reports and in the online hiring pipeline tool. Recruitment is updated regularly about progress made toward hiring persons with disabilities including those with a targeted disability.

### 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 Disability Program Manager and Disability Recruiter are dedicated staffing resources for FY2020.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	2	0	0	Christine H. Disability Recruitment Program Manager
Architectural Barriers Act Compliance	3	0	0	Ben B. Installations & Logistics and
Special Emphasis Program for PWD and PWTD	1	0	0	Stephanie J. Special Emphasis Program Manager
Processing reasonable accommodation requests from applicants and employees	3	0	1	Marcia L. Case Mgt and Consultation Services Team Lead and Applicants only- Christine H., Disability Recruitment Program Manager, Office of External Recruitment and Hiring.
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Christine H. Disability Recruitment Program Manager
Section 508 Compliance	4	1	1	Dan H. Capabilities

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

Each Reasonable Accommodation Manager received at least 20 hours of continuing education in the past year, including coursework through CDMS.org, Certified Disability Management Specialist, which focuses on disability management in the workplace. Additional training through the Great Plains ADA Center, focusing on specific issues regarding workplace accommodations for individuals with disabilities. Reasonable Accommodations Managers also completed specific training to

maintain their certifications and licensure in the nursing, employee assistance, and social work fields. The interpreters completed courses and activities as part of the Job Quality Standard (JQS) to gain and enhance extra-linguistic knowledge of the environments in which they interpret. The courses offered through the National Cryptologic School are standard issue computer-based modules incorporated into an interpreting-centric curriculum. D64 also provided a quarterly in-house training session for the sign language team. One session was opened to the IC and included interpreters from six agencies for broader peer-to-peer learning.

## 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

The Office of Reasonable Accommodations & Accessibility is fully staffed and partners with Installations & Logistics, 508 Compliance support, and the Disability Recruitment Program Manager for external recruitment to support employees and applicants.

## Section III: Program Deficiencies In The Disability Program

## 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.

In FY2020, the Disability Program Manager and Recruiter participated in numerous disability-focused recruitment events: Career invitational for People with Disabilities, Career Expo at Gallaudet University in Washington, D.C., Equal Opportunities Publications (EOPs) Careers & the DisABLED Virtual Career Expo (2 events), Rochester Institute of Technology (RIT), NTID Fall Career Fair, Melwood, Diversity Conference (Neurodiversity in the Workplace), National Federation of the Blind (NFB) 53rd Annual Convention (3 outreach events), Bender Virtual Career Fair, Mid-Atlantic ADA Expo, New Jersey Division of Vocational Rehabilitation Services (NJDVRS) Recruitment & Inclusion Job Fair, ABILITY Job Fair, Intelligence Community (IC) Virtual Career Fairs, IC Deaf & Hard of Hearing Summit, New Jersey Division of Vocational Rehabilitation Services (NJDVRS) Recruitment & Inclusion Job Fair and Bender Virtual Fair (3 outreach events).

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

The NSA's External Recruitment and Hiring fulfills its Diversity Recruitment Strategic Plan through community outreach and marketing events. We research and attend specific professional events knowing the attendees will be both people with Targeted Disabilities and people with Non-Targeted Disabilities. The Agency closely tracks all external events by category to ensure inclusion of groups with differing abilities. The NSA uses the Schedule A Hiring Authority in an indirect capacity to source, recruit, and hire underrepresented talent into the permanent workforce. Through the involvement with the Workforce Recruitment Program, the Bender Virtual Career Fair, the Careers and the disABLED Expo, and on-campus outreach events, the Agency displays our culture of diversity inclusion. Once a year, External Recruitment and Hiring hosts a Career Invitational for people with a disability. Candidates are sourced from these programs/events and invited to interview at a full-day event. Success in reaching our Targeted and Non-Targeted Disability hiring goals can be attributed directly to this event. The External Recruitment and Hiring division also leverages our Employee Resource Groups at the grass-root level to engage with student organizations at colleges and universities throughout the U.S. We foster relationships with both Disabilities Affairs and Veteran Affairs at Center for Academic Enhancement (CAE) schools through the utilization of the Campus Ambassador Program. Through these recruitment strategies, the Agency

continues to meet its hiring goals in FY2020, for attracting applicants who self-identify as a Person with a Disability or a Person with a Targeted Disability.

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.

1. N/A - NSA is already a part of the excepted service and can make appointments without having to use competitive selection unlike most other agencies. Therefore, NSA need not invoke Schedule A authority; 2. The Program Manager for Disability Recruitment sources candidates with a documented disability from a variety of channels. Applications are shared with the External Recruitment, Hiring Recruiters, and Staffing Leads. Applicants who meet minimum qualifications and are determined to be a qualified applicant are forwarded to the appropriate Hiring Managers. If the candidate was sourced by the Targeted Disability Resource, then the Staffing Lead, Disability Program Manager or the Recruiter will share this information with the Hiring Manager.

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

The Agency released a new, fully accessible Disability Awareness training. Course completion is mandatory and must be completed once every 3 years.

## B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The Agency has already made contacts with professionals associated with the Maryland Rehabilitation Services as well as with the National Federation for the Blind of Maryland.

## 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

No comment.

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

% of New Hires					
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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 No

b. New Hires for MCO (PWTD) Answer No

No comment.

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

The Agency does not promote to work-roles therefore, data is not reported for this category of the MD-715.

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

The Agency does not promote to work-roles therefore, data is not reported for this category of the MD-715.

## 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 Affirmative Action Plan Council (AAPC) engaged in affirmative actions to improve advancement for employees with disabilities in the last year. The Council offered sessions of a course that teaches about the Agency promotion process specifically for employees with disabilities, worked with Employee Resource Group (ERG) leadership to share information on Agency career development programs at a People with Disabilities Employee Resource Group (PWD ERG) meeting and posted the information to

the ERG webpage for further reference. Working collaboratively with Agency organizations, the Council ensured that the Job Enrichment Board, which houses career enhancing opportunities for the entire workforce, is accessible and useable by all. The PWD ERG also hosted a mentoring group specifically for the employee resource group members with disabilities.

## B. CAREER DEVELOPMENT OPPORTUNITES

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

In FY2020, the Affirmative Action Plan Council ensure that members of the PWD ERG are aware of career development programs by discussing them at a PWD ERG meeting and posting information about the programs to the ERG webpage. The Council ensured the accessibility and usability of the Agency-wide Job Exchange Board that houses career enhancing opportunities. The Council also organized a briefing on an Agency Senior Technical Development program to the PWD ERG.

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 (%)
Training Programs	N/A	N/A				
Detail Programs	N/A	N/A				
Mentoring Programs	N/A	N/A				
Coaching Programs	N/A	N/A				
Fellowship Programs	N/A	NoRaw#	13.6%	0%	0%	0%
Other Career Development Programs	N/A	NoRaw#	14.3%	17.7%	1.4%	0%
Internship Programs	N/A	N/A	4.8%	N/A	1.5%	N/A

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

Group sizes are very small and so absence of triggers is mostly due to group size.

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

Group sizes are very small and so absence of triggers is mostly due to group size.

## 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

PWD: Cash Awards \$500 and Under (8.9%); \$1000-\$1999 (10.2%); \$2000-\$2999 (9.7%); \$3000-\$3999 (8.0%); \$4000-\$4999 (5.6%); \$5000+ (6.6%); PWTD: Cash Awards \$3000-\$3999 (1.39%); \$4000-\$4999 (0.84%) Inclusion Rate: PWD (12%); PWTD (2%)

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

No comment.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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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

No comment.

## D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

## c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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## d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	Yes
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Fails to meet 4/5th rule: GG15, GG14, GG13
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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	No
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ii. Internal Selections (PWTD)	Answer	No
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## b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	Yes
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## c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	Yes
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## d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	Yes
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Fails to meet 4/5th rule: GG15, GG14, GG13
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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	No
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b. New Hires to GS-15 (PWD)	Answer	No
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c. New Hires to GS-14 (PWD)	Answer	No
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d. New Hires to GS-13 (PWD)	Answer	No
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No comment.

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	No
b. New Hires to GS-15 (PWTD)	Answer	No
c. New Hires to GS-14 (PWTD)	Answer	No
d. New Hires to GS-13 (PWTD)	Answer	No

No comment.

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	No
ii. Internal Selections (PWD)	Answer	No
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

N/A - NSA is rank in person Agency and there is no promotion associated with a change in position.

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	No
ii. Internal Selections (PWTD)	Answer	No
b. Managers		
i. Qualified Internal Applicants (PWTD)	Answer	No

ii. Internal Selections (PWTD)

Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

N/A - NSA is rank in person Agency and there is no promotion associated with a change in position.

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 No

b. New Hires for Managers (PWD)

Answer No

c. New Hires for Supervisors (PWD)

Answer No

No comment.

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 No

b. New Hires for Managers (PWTD)

Answer No

c. New Hires for Supervisors (PWTD)

Answer No

Applicants do not apply directly to a management position, so the benchmark of 12% and 2% is used for Persons with Disabilities overall and Targeted Disabilities, respectively.

## 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 N/A

No comment.

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

No comment.

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

a. Voluntary Separations (PWTD)

Answer No

b. Involuntary Separations (PWTD)

Answer No

No comment.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

No trigger exists.

## 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 notice explaining employees' and applicants' right under Section 508 of the Rehabilitation Act, including a description of how to file a complaint, was posted on the external and internal Agency webpages in 2020.

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.

A direct link is provided to applicants from the Diversity, Equality & Inclusion Accommodations & Accessibility page of the NSA.gov website. [https://www.nsa.gov/Portals/70/documents/about/diversity/Reasonable%20Accommodations%20SOP\\_Posted%20to%20External%20Web\\_072019.pdf?ver=2019-07-29-145510-490](https://www.nsa.gov/Portals/70/documents/about/diversity/Reasonable%20Accommodations%20SOP_Posted%20to%20External%20Web_072019.pdf?ver=2019-07-29-145510-490)

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.

NSA Installations & Logistics (I&L) organization is continually reviewing and surveying the buildings and exteriors to identify areas where NSA can provide improved accessibility. Existing program elements are under evaluation to determine opportunities for improvement. For new construction and renovations, Design Quality Assurance and Quality Control (QAQC) is performed by expert technical personnel to guide and verify ABA-compliant design products and includes coordination with DEI office. The Agency's Engineering Standards Board (ESB) and design discipline working groups are making continuous effort to examine

Facilities Criteria, in accordance with the supplemental requirements to DoD Unified Facilities Criteria and develop standard updates to assure and implement compliance and reasonable accommodation measures. The Chief of I&L initiated the Automatic Door Opener Program (ADO) in 2017. This plan includes installing, at a minimum, one ADO per office suite, which is over and beyond the ABA standards. This effort will continue through 2021 and is now an Agency standard for all new fit-ups. Following a completed study of NSAW campus sidewalks, construction for corrective action was initiated in FY2019 to bring sidewalks up to compliance with ABA standards. Renovations also include major restroom renovations at NSAW beginning in 2016 which continue and will ensure that all restrooms are ABA compliant. Agency Senior Leadership supported the initiative to install, at a minimum, one ABA compliant Single User Restroom per location of men's and women's facilities for new construction, furnished with signage for gender neutral use, to include wheelchair accessibility. The primary cafeteria upgrade design was completed and design renovations were kicked-off this year, FY2020. This includes a full infrastructure renovation, the cafeteria will meet the latest ABA requirements to ensure accessibility to be completed in FY2021. Two other cafeterias have undergone food service upgrades and now provide compliant, accessible food service for Agency personnel. Design kicked-off in FY2019 for construction in FY2020 to bring all spaces into ABA compliance and Agency standards above and beyond code requirements. Intersections Adaptive Technology: I&L is expanding the traffic signaling system and tying it into the existing Adaptive Technology system, which will provide ABA compliant traffic signaling and crosswalk intersection communication. The Enterprise Accessibility Council (EAC) is an information sharing, investigative, and recommendation body, with representation across the enterprise. The purpose of the council is to lead efforts with the goal of making NSA the model for physical accessibility, digital accessibility, diversity, equitable outcomes and inclusion throughout the Intelligence Community, and ensure that building and facilities, as well as information and communication technology (ICT) is not a barrier to opportunities for any employee.

### 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.)

Implementation of workplace accommodation occurs within 21 business days once documentation is received from the employee.

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 reasonable accommodation process provides guidance on how to request workplace accommodation. The process from request to implementation takes approximately 7-21 days. Disability Awareness Training has been developed for coworkers, managers, recruiters, and hiring managers and is mandatory every 3 years. There is also sensitivity training available upon request as a workplace accommodation. Trends are monitored and adjustments are made in the accommodations implementation process when a high frequency of requests for particular accommodations, implementation time, accommodations equipment requested, security requirements and limitations, location of disabled employees, and total number of accommodation requests is identified.

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

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Workplace Care Attendant program has been up and running for several years now. Under the contract, the care assistants not only meet the daily needs for toileting and feeding (Activities of Daily Living) for employees who require it, but they are also able to assist in the OHES Medical Center Acute/Urgent Care clinic providing their services as care assistants. Employees and

applicants who need assistance with their Activities of Daily Living are referred to the Program Manager, and a collaborative agreement between employee and assistant is made to meet the employee's needs. The Agency posts procedures for requesting PAS on both external and internal websites for benefit of applicants and employees. <https://www.nsa.gov/Portals/70/documents/about/diversity/Workplace%20Care%20External%20SOP%206-25-2019%20A352.pdf?ver=2019-07-29-145510-817>

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer No

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

There were no findings of discrimination alleging harassment based on disability status for formal EEO complaints. The government-wide average for formal complaints filed by people with disabilities for Harassment is 20.82% and for Failure to Accommodate is 14.02%.

### 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 Yes

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.

The Agency is implementing a new mandatory requirement for supervisors to complete Disability Awareness training for FY2020. Further, additional sign languages interpreters were hired.

## 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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B6				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Promotion rates for persons with disabilities is lower in all grades when compared to employees without a disability.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	Y				
<b>Barrier(s) Identified?:</b>	Y				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Promotion and career opportunity limitations		Current process.		
	Non-inclusive culture to those with differing abilities		Current practice		
	Additional support needed for supervisors of those with disabilities		Current practice and procedures		
	Accessibility		Current procedure.		
	Accommodations		Current procedures.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
03/01/2018	09/30/2018	Yes		09/30/2018	Conduct full barrier analysis for persons with disabilities.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Chief, Strategy, Innovation, and Advocacy		Pat M.		Yes	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
09/30/2018	Conduct quantitative and qualitative analysis to determine if barriers exist for persons with disabilities.			Yes	09/30/2018
09/30/2018	Provide final recommendations for elimination of barriers.			Yes	09/30/2018
09/30/2021	Monitor progress made towards implementation of recommendations.			Yes	

Report of Accomplishments	
Fiscal Year	Accomplishment
2018	Completed barrier analysis for persons with disabilities and provided recommendations to the Affirmative Action Plan Council for implementation.
2019	Affirmative Action Plan Council has been established to support requirements outlined by EEOC and to fully implement the recommendations from the barrier analysis of persons with disabilities.

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

No comment.

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

No comment.

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.

No comment.