

## 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 |

Compared to the 12 percent benchmark, the agency does not have triggers associated with IWD participation in either grade cluster of the permanent workforce.

\*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 |

Compared to the 2 percent benchmark, the agency does not have triggers associated with IWTD participation in either grade cluster of the permanent workforce.

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 DON Disability Program encouraged the DON major commands to conduct their own resurvey campaigns that requested employees to self-identify as having a disability or targeted disability. The major commands were able to utilize OEEEO's Fact Sheet, "Updating Your Disability Status" as a resource to augment their efforts. The Fact Sheet detailed the DON's goal to ensure that at least 12 percent of the total workforce is comprised of Individuals with Disabilities (IWD), and 2 percent of Individuals with Targeted Disabilities (IWTD). The mandatory EEO web-based training for supervisors, hosted by the DON's Total Workforce Management System, contains a module solely for the IWD Program. This module lists the DON's 12 percent goal of employing

IWD and 2 percent goal of employing IWTD, and outlines actions that supervisors and hiring managers can take toward achieving these goals, such as actively utilizing the Schedule A(u) hiring authority and self-identification of a disability. The module then details the benefits of using Schedule A(u), the recruitment sources for which Schedule A(u) candidates can be found, such as the Workforce Recruitment Program (WRP), the importance of self-identification of a disability, and how employees can update their disability status. The training must be taken within 1 year of initial appointment to a supervisory position, and then as a refresher at least once every 3 years thereafter.

## 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

The agency performs disability program functions utilizing a combination of full-time and part-time personnel resources. Part-time resources typically execute disability-related and/or non-disability- related functions, based on organizational priorities, as resources permit. Some regulatory requirements for disability programs, such as timeliness of reasonable accommodation requests, are not being met; therefore, some aspects of the DON Disability Program would benefit from additional qualified personnel. Additional resources for EEO have been placed into future year budget cycles.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	0	0	0	Meena Farzanfar, Disability Program Manager
Processing applications from PWD and PWTD	0	0	500	Ms. Lisa Jox, Director of HR Operations
Section 508 Compliance	0	0	0	Christopher Julka FOIA Liaison and 508 Coordinator
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Meena Farzanfar, Disability Program Manager
Special Emphasis Program for PWD and PWTD	0	0	0	Meena Farzanfar, Disability Program Manager

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	0	0	Rear Admiral John W. Korka Commander, NAVFAC

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

The agency EEO program, including Disability Program elements, are dispersed both organizationally and geographically across 23 subordinate major commands and 65 lower-level activities, each of which are managed and resourced independently by their respective component heads. If needed, Disability Program staff seek out and attend training (e.g. Defense Equal Opportunity Management Institute (DEOMI) Disability Program Management Course) in order to carry out their responsibilities.

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

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

Answer No

The agency EEO program, including disability program elements, are dispersed both organizationally and geographically across 23 subordinate major commands and 65 lower-level activities, each of which are managed and resourced independently by their respective component heads. Funding and other resources are executed based on organizational priorities, as resources permit. Some regulatory requirements for disability programs, such as timeliness of reasonable accommodation requests, are not being met; therefore, some aspects of the DON Disability Program would benefit from additional funding and other resources. Additional resources for EEO have been placed into future year budget cycles.

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

<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]
<b>Brief Description of Program Deficiency</b>	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]
<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
<b>Brief Description of Program Deficiency</b>	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)]

## 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 PWTDD

### 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 DON utilizes WRP as a recruitment source to bring on students and recent graduates with disabilities on a temporary and permanent basis. The WRP database contains the largest pool of Schedule A(u)-eligible candidates to recruit from, and is refreshed with new candidates each year. The DoD provides its components, to include the DON, with funding to fill a limited number of 14-week placements. In FY 2019, access to the DoD centralized fund became restricted in June 2019 during the height of WRP utilization, limiting the DON's ability to grow the program. Despite this significant setback, the DON was able to fill 52 DoD-funded authorizations with 42 WRP participants. In addition, 14 participants were placed in permanent positions within the DON, resulting in a 33 percent permanent placement rate, which is the highest permanent placement rate ever achieved. DON plans to continue utilizing and marketing WRP as a way to recruit and hire individuals with disabilities, including individuals with targeted disabilities. The DON's subordinate components conduct various recruiting efforts to identify job applicants with disabilities and with targeted disabilities, to varying degrees of success. Some commands attend job fairs specifically for IWD, include disability hiring authorities (e.g. Schedule A(u), 30 percent or more Disabled Veteran, etc.) in the area of consideration of vacancy announcements, and/or develop and/or maintain relationships with vocational rehabilitation agencies and relevant colleges/universities.

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 PWTDD for positions in the permanent workforce

DON's major commands leverage available hiring flexibilities (to include the 30 percent or more Disabled Veteran, Schedule A(u), and Veterans' Recruitment Appointment (VRA)), as well as various recruitment sources (e.g. Wounded Warrior programs, WRP, etc.) in order to identify the most suitable candidate to meet workforce needs. According to DON FY 2019 data, 1.3 percent of new hires (348/27,451) were hired through the 30 percent or more Disabled Veteran hiring authority (up from 1.1 percent in FY 2018), and 1.7 percent (459/27,451) were hired through Schedule A(u) (up from 1.6 percent in FY 2018).

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.

The DON utilizes hiring authorities that take disability into account as an Area of Consideration (AOC) in vacancy announcements. When it is included as an AOC, and applicants apply for a relevant position through www.USAJobs.gov and want to exercise their eligibility for one of these authorities, they self-certify their eligibility while completing the questionnaire, and provide proof of eligibility (e.g. with Schedule A(u) letter or U.S. Department of Veterans Affairs disability rating letter, etc.) before submitting their application. The HR Specialist then evaluates the sufficiency of the documentation, and if deemed sufficient and the candidate is deemed qualified for the position, the candidate may be added to the certificate of eligible candidates, which is provided to 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

Supervisors are required to take Supervisory EEO Training and "Hiring Talent" training, which are computer-based courses in

TWMS. The Supervisory EEO Training is required to be taken within 1 year of initial appointment to a supervisory position, with a refresher taken at least every 3 years thereafter. The IWD Program section of this training describes the Schedule A(u) hiring authority, indicates that candidates may be found through OPM’s Shared List of People with Disabilities and the WRP, and informs hiring managers that a best practice is to have qualified Schedule A(u) candidates prior to putting in a Request for Personnel Action (RPA), and to include People with Disabilities as an AOC on the vacancy announcement. The “Hiring Talent” training is required to be taken within 1 year of initial appointment to a supervisory position, and every year thereafter. This training has its own section on Hiring People with Disabilities and OEEO will work with the creators of the training in FY 2020 to improve the course content. Information on VRA and 30 percent or more Disabled Veteran (including Wounded Warriors) are included in the “Hiring Veterans” section of this training. In addition to the training above, the DON’s subordinate components also facilitate additional component-specific supervisory training requirements pertaining to Disability Program priorities and hiring flexibilities.

**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 DON’s subordinate components have established and/or maintained contacts to varying degrees with various disability employment organizations, and especially Wounded Warriors organizations. The DON actively promotes and utilizes the WRP, which is a Federal government-wide recruitment and referral program managed by the Department of Labor and DoD that connects the DON’s hiring managers with qualified candidates with disabilities for temporary and permanent positions. This database contains candidates from hundreds of colleges and universities across the country.

**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 Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

Triggers exist for both IWD and IWTD among new hires in the permanent workforce. The permanent workforce hire percentage for IWDs is 6 percent (which is lower than the 12 percent benchmark), while the permanent workforce hire percentage for IWTD is 0.9 percent (which is lower than the 2 percent benchmark).

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

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Occupational Series 0301, 0343, 0346, 0501, 0801, and 2210 have triggers for both IWD and IWTD. Occupational Series 0802 and 0830 have triggers only for IWD, and 0855 only has a trigger for IWTD.

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

All Occupational Series (0301, 0343, 0346, 0501, 0801, 0802, 0830, 0855, 1102, and 2201) have triggers for IWD. Occupational Series 0855 also has a trigger for IWTD.

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

All MCOs, except for Occupational Series 0855, have triggers for both IWD and IWTD.

## 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 DON offers and seeks applications for a multitude of advancement opportunities, where all eligible candidates are encouraged to apply. Some of the DON’s components offer and administer advancement opportunities, where IWD and IWTD could be considered.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The DON offers and seeks applications for a multitude of advancement opportunities, where all eligible candidates are encouraged to apply. Some of the DON’s components offer and administer advancement opportunities, where IWD and IWTD could be

considered.

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	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	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

The agency does not maintain relevant data on career development opportunities; thus, the presence of triggers cannot be assessed.

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

The agency does not maintain relevant data on career development opportunities; thus, the presence of triggers cannot be assessed.

**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

Both IWD (9.49%) and IWTD (2.00%) have triggers in lower-level cash awards.

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 %
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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 Yes
- b. Pay Increases (PWTD) Answer Yes

Both IWD (10.59%) and IWTD (1.85%) have triggers in Quality Step Increases.

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 Yes
- b. Other Types of Recognition (PWTD) Answer Yes

The DON currently does not have data on other types of employee recognition programs.

## 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



The agency has multiple relevant triggers involving IWD: a. For the SES level, no internal applicants who identified as IWD were found to be qualified (or subsequently selected), compared to 11 percent in the relevant applicant pool. b. For the GS-15 level, only 2 percent of qualified internal applicants identified as IWD, compared to 11 percent in the relevant applicant pool, and only 1.9 percent of selectees identified as IWD, compared to 2 percent in the qualified applicant pool. c. For the GS-14 level, only 2.5 percent of qualified internal applicants identified as IWD, compared to 11.8 percent in the relevant applicant pool, and only 2 percent of selectees identified as IWD, compared to 2.5 percent in the qualified applicant pool. d. For the GS-13 level, only 3.1 percent of qualified internal applicants identified as IWD, compared to 13.5 percent in the relevant applicant pool.

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

The agency has multiple triggers involving IWTD among the qualified internal applicants and/or selectees for promotions to senior grade levels: a. For the SES level, no internal applicants who identified as IWTD were found to be qualified (or subsequently selected), compared to 1.9 percent in the relevant applicant pool. b. On the GS-15 level, only 1 percent of qualified internal applicants identified as IWTD, compared to 2.2 percent in the relevant applicant pool, and only 0.95 percent of selectees identified as IWTD, compared to 1.0 percent in the qualified applicant pool. c. On the GS-14 level, only 1.1 percent of qualified internal applicants identified as IWTD, compared to 2.1 percent in the relevant applicant pool, and only 0.8 percent of selectees identified as IWTD, compared to 1.1 percent in the qualified applicant pool. d. For GS-13, only 1.4 percent of qualified internal applicants identified as IWTD, compared to 2.4 percent in the relevant applicant pool, and only 1.1 percent of selectees identified as IWTD, compared to 1.4 percent in the qualified applicant pool.

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 No

d. New Hires to GS-13 (PWD) Answer Yes

Among qualified new hire applicants, 1.2 percent of applicants to SES and 6.2 percent of applicants to GS-15 identified as IWD; however, none were selected to either group. 3.3 percent of qualified applicants to GS-13 identified as IWD; however, only 2.5 percent were selected. Nonetheless, the selection rate for GS-13 applicants who identified as IWD (2.5 percent) still exceeded the combined selection rate for applicants within the No Disability and Not Identified categories (2.3 percent).

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 No

d. New Hires to GS-13 (PWTD) Answer Yes

Among qualified new hire applicants, 0.5 percent of applicants to SES and 3.4 percent of applicants to GS-15 identified as IWTD; however, none were selected to either group. 1.6 percent of qualified applicants to GS-13 identified as IWTD; however, only 1.1 percent were selected. The selection rate for applicants who identified as IWTD to all four grade levels fell short of the corresponding combined selection rate for applicants within the No Disability and Not Identified categories.

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 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 No

With respect to Executive positions, 7.8 percent of those qualified were IWD, but only 3.6 percent of those selected were IWD. For Manager positions, 5.9 percent of applicants were IWD, however only 5.3 of those qualified were IWD, and only 5.1 percent of those selected were IWD. For Supervisory positions, 6.6 percent of applicants were IWD, however only 6.3 of those qualified were IWD.

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 Yes

b. Managers

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer Yes

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

With respect to Executive positions, 3.8 percent of those qualified were IWTDD, but only 1.8 percent of those selected were IWTDD. For Manager positions, 5.2 percent of those qualified were IWTDD, but only 2.3 percent of those selected were IWTDD. For Supervisory positions, 3.2 percent of applicants were IWTDD, however only 2.8 of those qualified were IWTDD.

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 No

With respect to Executive positions, 7.2 percent of those qualified were IWD, but none of those selected were IWD. For Manager positions, 5.4 percent of those qualified were IWD, and only 3.7 percent of those selected were IWD.

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 No

With respect to Executive positions, 3.9 percent of those qualified were IWTDD, but none of those selected were IWTDD. For Manager positions, 2.5 percent of those qualified were IWTDD, and only 1.7 percent of those selected were IWTDD.

## 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

In the reporting period, there were 379 employees appointed via the Schedule A(u) hiring authority who were eligible for conversion to competitive service. During the reporting period, 256 employees were converted. The DON will need to obtain and analyze additional data to discern why it did not convert all eligible employees who were appointed via the Schedule A(u) hiring authority to competitive service.

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 Yes

Involuntary separations of IWD exceeded those of non-IWD by 5 percent.

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 Yes

b. Involuntary Separations (PWTD) Answer No

Voluntary separations of IWTD exceeded those of non-IWTD by 2 percent.

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.

DON does not centrally conduct or collect exit interview or exist survey results; however, some subordinate components conduct and/or collect this information locally. Preliminary analysis does not identify any systemic or consistent reasons for IWD and/or IWTD to separate from the DON.

**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.

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.

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 DON works to expeditiously resolve formal Architectural Barriers Act and Section 508 complaints as they are referred by DoD and the U.S. Access Board for processing. In addition, the DON regularly processes requests for and provides reasonable accommodations for modifications within the work environment that involve physical and electronic accessibility. As part of the DON's Accessibility Policy Statement, the DON OEEO serves as the point of contact for addressing accessibility concerns for agency facilities and technology, and will better understand the state of the DON's overall accessibility after analyzing the incoming inquiries. Based on the trends derived from this information, the DON can plan to eliminate certain barriers to accessibility in future years. The DON heavily utilizes the DoD's Computer/Electronic Accommodations Program (CAP) to provide reasonable accommodations in the form of assistive technology. In FY 2019, CAP provided the DON workforce and service members with a total of 2,233 accommodations costing \$592,375.18. The DON has a strong team that meets weekly to execute a unique process to ensure that the CAP offerings are compatible and are approved for use on the Navy/Marine Corps Intranet (NMCI). This team continually reviews CAP's offerings, identifies the latest versions of assistive technologies, and procures those products for risk-assessment, compatibility testing, and approval on the NMCI network to ensure 508 compliance. The DON Program Manager for CAP Assistive Technologies troubleshoots any issues with user software if the software was obtained through CAP, and follows up with the appropriate parties to ensure expeditious resolution, so that individuals who rely on assistive technology can fully perform their job duties. In some cases, despite extensive testing, the DON is not able to support certain technologies on the NMCI network, as certain aspects of some products do not comply with cybersecurity requirements imposed on DoD components, i.e. the Z70 videophone. The DON has been at the forefront of this conversation with DoD and other DoD Components, and is working toward a solution that will increase the availability of assistive technologies and 508 compliance.

### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The DON utilizes the Navy Electronic Accommodations Tracker (NEAT) to collect reasonable accommodation (RA) data, which is a database system that DON's EEO offices use to document their efforts and milestones in processing requests for RA. OEEO manages NEAT and has administrative oversight of RA processing in the database. As this reporting cycle is the third year that DON has collected reasonable accommodation data in NEAT, OEEO is still working to verify the information entered and to enhance the system's functionality. There are known errors with the system's calculations of the "Days in Process" field (which is based on the Request Received Date and Request Closed date). Recognizing that limitation, the data in NEAT shows that the DON processed 2,515 requests for disability accommodations in FY 2019 (not including those for recurring requests), taking an average of 100 days for the requests to be processed. DON's Procedures for Processing Requests for Reasonable Accommodation require that reasonable accommodation requests be processed (from initial request to decision of whether to accommodate) within 30 calendar days. Therefore, the DON's average processing time is longer than the timeframe prescribed in DON policy. In FY 2019, OEEO has invested time and resources to improve NEAT, with system upgrades being implemented in FY 2020. Once NEAT improvements have been made, OEEO will be able to better understand whether untimely processing is due to system issues, insufficient resources in RA processing offices, or if barriers exist within the existing RA procedures.

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 agency EEO Program, including disability program elements, are dispersed both organizationally and geographically across 23

subordinate major commands and 65 lower-level activities, each of which are managed and resourced independently by their respective component heads. Some of the DON's subordinate components have issued additional reasonable accommodation guidance, in addition to the DON's Procedures for Processing Requests for Reasonable Accommodation. The DON's subordinate components executed their reasonable accommodation programs to varying degrees of success. Training was delivered on reasonable accommodation at the majority of the commands, and is also included in the mandatory Supervisory EEO Training course.

## **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 DON has publicly posted a policy statement and Procedures for Processing Requests for Personal Assistance Services (PAS). In FY 2018, the DON began building the PAS Request functionality in NEAT to capture data on the number of PAS requests and whether approved services are timely provided. This capability was previously reported to be deployed in FY 2019; however, the project encountered a number of delays and will now be deployed in FY 2020. Once the PAS Request functionality is imported into NEAT and NEAT users enter PAS request data into the system, the DON can begin evaluating trend data and effectiveness of the program. The mandatory Supervisory EEO Training contains a module solely for the IWD Program. This module includes a slide dedicated to PAS, which outlines the DON's obligation to provide PAS to those who need the services because of their targeted disability, defines PAS, distinguishes between PAS and reasonable accommodation, and refers to the DON's PAS procedures for more information.

## **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 N/A

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 Yes

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.

All cases in the questions above involved only settlement agreements. The DON did not have any 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 N/A

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.

All cases in the questions above involved only settlement agreements. The DON did not have any findings of discrimination alleging harassment based on disability status.
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## Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The DON-wide search for vacant positions through the reasonable accommodation process takes longer than DON- imposed timeframes, with low results for potential matches and actual placement. During FY 2018 for requests in this stage of the process, 9 percent of requests had potential matches identified, with 2 percent resulting in placement.</p>			
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>			
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>				
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The current process for locating vacant funded positions for potential reassignment as an accommodation is outlined in the DON Procedures for Processing Reasonable Accommodation Requests and Appendix K of the DON USA Staffing Business Process Guide. Based on these documents and the existing practices, the DON-wide vacancies that are considered for potential reassignment are those that are “cleared” through the Active Reasonable Accommodation List (ARAL) prior to being announced. The DON-wide expanded job search process as it exists is ineffective in providing placements for individuals who are no longer able to perform the essential functions of their position because of their disability.</p>			
<p><b>Objective</b></p>	<p>1. Issue revised process for which the search for DON vacancies is conducted.                  2. Increase education and update reference materials regarding the search for vacant positions and stakeholder roles/responsibilities.</p> <p><b>Date Objective Initiated</b>   Apr 1, 2018</p> <hr/> <p><b>Target Date For Completion Of Objective</b>   Dec 31, 2019</p>			
<p><b>Responsible Officials</b></p>	<p>Meena Farzanfar Disability Program Manager</p>			
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>
<p>04/01/2018</p>	<p>Establish working group with relevant stakeholders to explore process improvement opportunities in DON-wide search for vacancies.</p>	<p>Yes</p>		<p>04/01/2018</p>
<p>05/01/2018</p>	<p>Map and analyze the current process, roles/responsibilities, and bottlenecks.</p>	<p>Yes</p>		<p>05/01/2018</p>
<p>04/01/2018</p>	<p>Convene working group to brainstorm and document proposed process revisions.</p>	<p>Yes</p>		<p>03/07/2018</p>
<p>06/30/2019</p>	<p>Propose process changes to leadership and obtain approval for execution.</p>	<p>Yes</p>		<p>06/06/2019</p>
<p>07/31/2019</p>	<p>Draft revised process based on the course of action identified for execution.</p>	<p>Yes</p>		<p>09/30/2019</p>
<p>08/30/2019</p>	<p>Request and incorporate feedback regarding the draft process from key stakeholders.</p>	<p>Yes</p>	<p>02/01/2020</p>	
<p>10/01/2019</p>	<p>Issue revised process and ensure execution.</p>	<p>Yes</p>	<p>02/01/2020</p>	
<p>10/01/2019</p>	<p>Issue revised process and marketing/reference materials.</p>	<p>Yes</p>	<p>09/30/2020</p>	
<p>12/31/2019</p>	<p>Train on new process for identifying vacancies to HR and EEO communities</p>	<p>Yes</p>	<p>09/30/2020</p>	
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></p>			



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

The accomplishment of planned activities is still underway. The impact of the activities toward eliminating barriers will be assessed in the FY 2020 MD-715.

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

The accomplishment of planned activities is still underway. The impact of the activities toward eliminating barriers will be assessed in the FY 2020 MD-715.

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.

The accomplishment of planned activities is still underway. The impact of the activities toward eliminating barriers will be assessed in the FY 2020 MD-715.