Affirmative Action Plan
for the Recruitment, Hiring, Advancement, and
Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

    a. Cluster GS-1 to GS-10 (PWD)   Answer   No

    b. Cluster GS-11 to SES (PWD)   Answer   Yes

b. 12.5 % was the percentage of people in the BPA workforce falling into the GS-11 to SES cluster.

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

    a. Cluster GS-1 to GS-10 (PWTD)   Answer   No

    b. Cluster GS-11 to SES (PWTD)   Answer   Yes

b. 1.6 % was the percentage of people in the BPA workforce falling into the GS-11 to SES cluster.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	101	28	27.72	11	10.89
Grades GS-11 to SES	1966	183	9.31	45	2.29

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

BPA follows the national civilian labor force to benchmark numerical goals. The Office of Civil Rights (CREEO) educates managers and or recruiters about the barrier analysis process to reinforce parity goals for women, minorities, persons with disabilities and veterans.

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

In FY 2019, CREEO Director advertised and selected two additional EEO specialist to her staff. One will serve as the agency's Disability Employment Program Manager (DEPM). The position will be filled the first quarter of FY 2020. The DEPM will take lead on many matters pertaining to Disability Employment Program.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	LesleyAnne Ezelle Human Resources Specialist laezelle@bpa.gov
Processing applications from PWD and PWTD	1	0	0	Colleen Fields, Supervisory HR Specialist (Recruitment & Placement), ccfields@bpa.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Ernesto Jaquez Equal Employment Specialist ejaquez@bpa.gov
Section 508 Compliance	1	0	0	Mark Holman Equal Employment Specialist maholman@bpa.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	LesleyAnne Ezelle Human Resources Specialist laezelle@bpa.gov
Architectural Barriers Act Compliance	1	0	0	Mark Holman Equal Employment Specialist maholman@bpa.gov

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

Answer   No

The Basic DEPM course covers: Roles and responsibilities of an (Effective) Disability Program Manager, Sections 501 and 508 of the Rehabilitation Act of 1973, The Reasonable Accommodation Process, EEOC Management Directive 715 (MD-715) Disability Data Collection, Why it's Necessary Emergency Evacuation Planning, Recruiting: Interns, Vets & Schedule A and The Architectural Barriers Act (ABA).

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

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		
Objective	The EEO Director will work with management in an effort to secure funding to increase EEO staff consistent with program scope.		
Target Date	Jan 31, 2021		
Completion Date	Sep 30, 2019		
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Jan 31, 2021		Increase staffing levels consistent with program scope. Ongoing
Accomplishments	*Fiscal Year*	*Accomplishment*	

Brief Description of Program Deficiency	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]		
Objective	The EEO Director will work with management in an effort to secure funding to increase EEO staff consistent with program scope.		
Target Date	Jan 31, 2021		
Completion Date	Aug 30, 2019		
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Jan 31, 2021		Increase staffing levels consistent with program scope. Ongoing
Accomplishments	*Fiscal Year*	*Accomplishment*	

Brief Description of Program Deficiency	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]		
Objective	Reasonable Accommodations is the function of Human Capital Management.		
Target Date	Sep 30, 2019		
Completion Date	Sep 30, 2019		
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Jan 31, 2021	September 30, 2019	Draft and implement elements in managers and supervisors performance appraisal to evaluate their commitment to EEO policies, principles and program.
Accomplishments	*Fiscal Year*	*Accomplishment*	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

Targeted Recruitment – We have designed a process to identify/track candidates from a variety of events and map the outreach efforts to actual hires at BPA to determine our success rate (or lack thereof). This process is underway in our Recruitment & Placement workgroup within Human Capital Management.

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

Information about the Schedule A Hiring Authority is available for managers on BPA's internal Manager's Resource page. BPA EEO office will work with the Public Affairs Sounding Board team to create an external webpage on BPA Jobs website to promote Schedule A Hiring Authority once there is a Person's with Targeted Disabilities Recruitment plan in place. BPA's Civil Rights/ EEO Office and BPA's Disability Awareness Resource Group will incorporate the following measures for FY 2018 and beyond as suggested by the Equal Employment Opportunity Commission: 1. Collect and review applicant flow data to access the recruitment of qualified individuals with targeted disabilities. NOTE: The Bonneville Power Administration does not receive applicant flow data from the USA Jobs website. 2. Conduct focus groups with employees and targeted disabilities to discuss their recruitment, hiring and career growth experiences with the agency. 3. Meet with disability organizations and universities' Disabled Student Services offices to explore the perceptions of the agency within the disability community. 4. Evaluate the career advancement opportunities for employees with targeted disabilities to and through the mission critical occupations. 5. Review all occupations and identify series having occupational requirements that may preclude employment of People with Targeted Disabilities. 6. Conduct climate assessment (surveys) to obtain feedback from the workforce. 7. Resurvey the workforce to ensure accurate disability status information. 8. We will work with the Oregon State Department of Rehabilitation to apply best practices for empowering people with disabilities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Targeted Recruitment – BPA has designed an effective process to identify/track candidates from a variety of Events and map to actual hires at BPA to determine our success rate (or lack thereof) for those under Schedule A or other hiring authority. This process is underway in our Recruitment & Placement workgroup within HR. Our Recruitment Coordinator will be utilizing a program to monitor this activity beginning with second quarter of FY 2018. The Recruitment Coordinator will let the hiring officials know about these relevant individuals.

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.

<div align="right">Answer   Yes</div>

HCM offered 4 training sessions in FY2019, educating managers on the use of hiring authorities. Course Title: Personnel Basics for Federal Managers Hiring Course Date(s): 12/12/18, 3/13/19, 6/19/19, 9/18/19 Target Audience: Managers and Supervisors Course Description: This class uses real-life examples to teach the nuts and bolts of federal personnel law and hiring in the federal environment. Managers learn tools and strategies needed to handle employee discipline and performance issues, ranging from informal counseling to formal discipline to removal actions with appeals to the Merit Systems Protection Board (MSPB). Managers will also learn the basic structure of federal hiring procedures that will help navigate the process more efficiently and quickly.

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.

In FY 2019, BPA increased its CREEO staff by hiring two EEO Specialist. Building the Disability Employment Program will be one of the main responsibilities of the new staff.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

        a. New Hires for Permanent Workforce (PWD)   Answer   No

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

b. Triggers exist for PWTD. PWTD represented 0% of new hires in the permanent workforce.

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

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

a. Triggers exist for 2 of our seven MCO's. Their percentage is below the 12% threshold. These MCO's are for the following OPM occupation codes: 0850 and 1130 b. Triggers exist for the all MCO's. PWTD represented 0% of the new hires in the permanent workforce.

New Hires to Mission-Critical Occupations	Total	Reportable Disability		Targetable Disability	
		Qualified Applicants	New Hires	Qualified Applicants	New Hires
	(#)	(%)	(%)	(%)	(%)
Numerical Goal	--	12%		2%	
0201HUMAN RESOURCES MANAGEMENT	0	0.00	0.00	0.00	0.00
0340PROGRAM MANAGEMENT	0	0.00	0.00	0.00	0.00

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0501FINANCIAL ADMINISTRATION AND PROGRAM	0	0.00	0.00	0.00	0.00
0510ACCOUNTING	0	0.00	0.00	0.00	0.00
0801GENERAL ENGINEERING	0	0.00	0.00	0.00	0.00
0840NUCLEAR ENGINEERING	0	0.00	0.00	0.00	0.00
0850ELECTRICAL ENGINEERING	0	0.00	0.00	0.00	0.00
1101GENERAL BUSINESS AND INDUSTRY	0	0.00	0.00	0.00	0.00
1102CONTRACTING	0	0.00	0.00	0.00	0.00
1130PUBLIC UTILITIES SPECIALIST	0	0.00	0.00	0.00	0.00
2210INFORMATION TECHNOLOGY MANAGEMENT	0	0.00	0.00	0.00	0.00
2810ELECTRICIAN (HIGH VOLTAGE)	0	0.00	0.00	0.00	0.00
5407ELECTRIC POWER CONTROLLING	0	0.00	0.00	0.00	0.00

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

a. Triggers exist for all of the MCO's. b. Triggers exist for all of the MCO's.

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

a. 0 % was the percentage of PWD promoted into MCO's in the BPA workforce. b. 0 % was the percentage of PWD promoted into MCO's in the BPA workforce.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

> In FY 2019, BPA increased CREEO staff by hiring two EEO Specialists with start dates for the first quarter of FY 2020. Managing the Disability Employment Program will be one of the main responsibilities of the new Disability Employment Program Manager/ EEO Specialist.

B. CAREER DEVELOPMENT OPPORTUNITES

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

> Executive Excellence This program offers the BPA executive team a menu of development actions to deepen their current skills and competencies in the OPM Executive Core Competencies. Examples are formal training, 360 degree assessment, executive coaching, and collective-focused leadership of interventions at the enterprise level. Emerging Leader 2019 Emerging Leader is now a 3-day interactive course targeted for individual contributors exploring a possible career path as a manager at BPA. The class introduces tools to explore what it means to be a manager and leader at BPA.

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

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

        a. Applicants (PWD)   Answer   N/A

        b. Selections (PWD)   Answer   N/A

> not applicable

4.

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

      a. Applicants (PWTD)   Answer   N/A

      b. Selections (PWTD)   Answer   N/A

not applicable

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

a. Time off awards of 9 hours or less was not a triggering event. All other time off awards and cash awards, though, were triggers in the BPA workforce. b. Time off awards of 9 hours or less was not a triggering event. All other time off awards and cash awards, though, were triggers in the BPA workforce.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	73	3.15	2.31	1.33	3.79
Time-Off Awards 1 - 10 Hours: Total Hours	508	22.73	17.11	9.33	27.49
Time-Off Awards 1 - 10 Hours: Average Hours	6	2.45	0.29	9.33	0.00
Time-Off Awards 11 - 20 hours: Awards Given	134	8.04	4.29	4.00	9.48
Time-Off Awards 11 - 20 Hours: Total Hours	2522	151.05	81.38	80.00	176.30
Time-Off Awards 11 - 20 Hours: Average Hours	18	6.29	0.76	26.67	-0.95
Time-Off Awards 21 - 30 hours: Awards Given	319	11.19	11.69	10.67	11.37
Time-Off Awards 21 - 30 Hours: Total Hours	9422	334.97	345.02	320.00	340.28
Time-Off Awards 21 - 30 Hours: Average Hours	29	10.14	1.22	40.00	-0.47
Time-Off Awards 31 - 40 hours: Awards Given	308	7.34	11.73	6.67	7.58
Time-Off Awards 31 - 40 Hours: Total Hours	12234	292.66	465.62	266.67	301.90
Time-Off Awards 31 - 40 Hours: Average Hours	39	13.64	1.64	53.33	-0.47
Time-Off Awards 41 or more Hours: Awards Given	50	2.10	1.77	4.00	1.42
Time-Off Awards 41 or more Hours: Total Hours	2498	104.90	88.23	200.00	71.09
Time-Off Awards 41 or more Hours: Average Hours	49	17.48	2.06	66.67	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $501 - $999: Awards Given	155	6.29	5.38	8.00	5.69
Cash Awards: $501 - $999: Total Amount	107206	4597.90	3670.28	6270.67	4003.32
Cash Awards: $501 - $999: Average Amount	691	255.24	28.67	1044.00	-25.12
Cash Awards: $1000 - $1999: Awards Given	1015	33.92	37.12	41.33	31.28
Cash Awards: $1000 - $1999: Total Amount	1377583	49207.34	49851.66	55297.33	47042.65
Cash Awards: $1000 - $1999: Average Amount	1357	506.99	56.45	1782.67	53.55
Cash Awards: $2000 - $2999: Awards Given	848	29.72	30.98	33.33	28.44
Cash Awards: $2000 - $2999: Total Amount	2092829	73043.36	76523.54	83322.67	69389.57
Cash Awards: $2000 - $2999: Average Amount	2467	859.09	103.83	3332.00	-19.91
Cash Awards: $3000 - $3999: Awards Given	450	12.94	16.81	13.33	12.80
Cash Awards: $3000 - $3999: Total Amount	1525694	42841.96	57152.12	43592.00	42575.36
Cash Awards: $3000 - $3999: Average Amount	3390	1157.69	142.88	4358.67	19.91
Cash Awards: $4000 - $4999: Awards Given	103	1.05	4.20	1.33	0.95
Cash Awards: $4000 - $4999: Total Amount	440990	4494.76	17996.43	5581.33	4108.53
Cash Awards: $4000 - $4999: Average Amount	4281	1498.25	179.95	5581.33	46.92
Cash Awards: $5000 or more: Awards Given	35	1.40	1.26	2.67	0.95
Cash Awards: $5000 or more: Total Amount	193031	7080.42	7052.59	13436.00	4821.33
Cash Awards: $5000 or more: Average Amount	5515	1769.93	235.06	6717.33	11.37

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

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a. QSI's were triggers in the BPA workforce (PWD 4.2%). b. QSI's were triggers in the BPA workforce (PWTD 0.8%)

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

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

not applicable

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

a. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce. b. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce. c. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce. d. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce.

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   No

        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   No

      ii. Internal Selections (PWTD)   Answer   Yes

> a. There were no Qualified Internal Applicants or Internal Selections for PWTD's in the BPA workforce. b. There was one (2.70%) Qualified Internal Applicant, but no Internal Selections for PWTD's in the BPA workforce. c. There were no Qualified Internal Applicants or Internal Selections for PWTD's in the BPA workforce. d. There was one (3.33%) Qualified Internal Applicant, but no Internal Selections for PWTD's in the BPA workforce.

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

   a. New Hires to SES (PWD)   Answer   Yes

   b. New Hires to GS-15 (PWD)   Answer   Yes

   c. New Hires to GS-14 (PWD)   Answer   Yes

   d. New Hires to GS-13 (PWD)   Answer   No

> a. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce. b. There were no Qualified Internal Applicant or Internal Selections for PWD's in the BPA workforce. c. There were no Qualified Internal Applicants or Internal Selections for PWD's in the BPA workforce. d. The participation of PWD's in the internal qualified applicant pool 3.33 %. Using that as the benchmark, the new hires at the GS-13 surpassed the benchmark with a participation rate of 21.4%.

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

   a. New Hires to SES (PWTD)   Answer   Yes

   b. New Hires to GS-15 (PWTD)   Answer   Yes

   c. New Hires to GS-14 (PWTD)   Answer   Yes

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

> a. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce. b. There were no Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce. c. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce. d. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory
positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

      i. Qualified Internal Applicants (PWD)   Answer   Yes

      ii. Internal Selections (PWD)   Answer   Yes

b. Managers

      i. Qualified Internal Applicants (PWD)   Answer   Yes

      ii. Internal Selections (PWD)   Answer   Yes

c. Supervisors

      i. Qualified Internal Applicants (PWD)   Answer   Yes

      ii. Internal Selections (PWD)   Answer   Yes

> a. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce. b. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection. c. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

    a. Executives

      i. Qualified Internal Applicants (PWTD)   Answer   Yes

      ii. Internal Selections (PWTD)   Answer   Yes

    b. Managers

      i. Qualified Internal Applicants (PWTD)   Answer   Yes

      ii. Internal Selections (PWTD)   Answer   Yes

    c. Supervisors

      i. Qualified Internal Applicants (PWTD)   Answer   Yes

      ii. Internal Selections (PWTD)   Answer   Yes

> a. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce. b. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection. c. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection

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

      a. New Hires for Executives (PWD)   Answer   Yes

      b. New Hires for Managers (PWD)   Answer   Yes

      c. New Hires for Supervisors (PWD)   Answer   Yes

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

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

a. There were no Qualified Internal Applicants for Internal Selections for PWTD's in the BPA workforce. b. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection. c. There was one Qualified Internal Applicant for Internal Selections for PWTD's in the BPA workforce and no selection.

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

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

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

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	3	0.00	0.12
Permanent Workforce: Resignation	27	0.67	0.98
Permanent Workforce: Retirement	93	4.70	3.11
Permanent Workforce: Other Separations	14	0.67	0.47
Permanent Workforce: Total Separations	137	6.04	4.68

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

      a.Voluntary Separations (PWTD)   Answer   No

      b.Involuntary Separations (PWTD)   Answer   No

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	3	0.00	0.11
Permanent Workforce: Resignation	27	2.67	0.90
Permanent Workforce: Retirement	93	6.67	3.18
Permanent Workforce: Other Separations	14	0.00	0.51
Permanent Workforce: Total Separations	137	9.33	4.70

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.

not applicable

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.

https://www.bpa.gov/Contact/website/Pages/Accessibility.aspx

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the
Architectural Barriers Act, including a description of how to file a complaint.

https://www.bpa.gov/Doing%20Business/finassist/docfa/BFAI-FY17-wo_Rx.pdf (see page 141)

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.

Here are several that we have executed in the last year or plan on undertaking this fiscal year. • Touchless ADA operators on all restrooms and ADA accessible areas • New Dyson Airblades mounted at ADA height • Touchless ADA operators at the East/West entry points • West entry gate ADA operator replacement • Touchless faucets, soap dispensers, flushometers on urinals and toilets, and paper towel dispensers • New ADA water closets and urinals mounted at correct ADA height in all restrooms • New ADA restroom partitions in all restrooms and locker rooms • New drinking and bottle filling stations at ADA height – FY19

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 average time for processing requests is 29 calendar days.

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.

Over the past year we've provided manager training, created a database for monitoring the program, updated our website based on user feedback, and consolidated many of our files to one system for easy reference.

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.

BPA timely processes individual requests for PAS on an ad-hoc basis.

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.

not applicable

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer   No

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

Answer   No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation

during the last fiscal year, please describe the corrective measures taken by the agency.

not applicable

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

Source of the Trigger:	EEO Complaint(s)
Specific Workforce Data Table:	NA
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Formal Complaints of Discrimination citing discrimination based on disability are high. While PWD comprise 10.5% of the workforce, 31% of the EEO cases cite a disability as the basis. Modify and implement new approaches to PWD educational outreach. Provide training in an effort to increase workforce competencies about working with PWD, providing reasonable accommodations, ensuring accessibility as well as ensuring mechanisms are available and accessible to ensure support and retention of PWD.
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities
Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	Y

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
10/01/2019	09/30/2023	Yes			Conduct focus groups with employees and targeted disabilities to discuss their recruitment, hiring and career growth experiences with the agency.
10/01/2019	09/30/2023	Yes			Meet with disability organizations and universities' Disabled Student Services offices to explore the perceptions of the agency within the disability community.
10/01/2019	09/30/2023	Yes			Evaluate the career advancement opportunities for employees with targeted disabilities to and through the mission critical occupations.
10/01/2019	09/30/2023	Yes			Review all occupations and identify series having occupational requirements that may preclude employment of People with Targeted Disabilities. Conduct climate assessment (surveys) to obtain feedback from the workforce.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
Report of Accomplishments				
Fiscal Year	**Accomplishment**			

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

The CREEO staffing levels was not able to support personnel to the development and management of a disability employment program. Therefore, there was no EEO personnel devoted to this program area. The last quarter of FY 2019, the CREEO Director advertised and selected two EEO Specialist to start in early FY2020. One of which will serve as the Disability Employment Program Manager.

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

All planned activities are still in progress.

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 last quarter of FY 2019, the CREEO Director advertised and selected two EEO Specialist to start in early FY2020. One of which will serve as the Disability Employment Program Manager. In this capacity, the focus will be to take the lead while working in coordination with key stakeholders to ensure triggers and barriers are removed for PWD and PWTD.