

## 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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

\*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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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 Assistant Director of HRD meets with the hiring managers monthly. Recruitment and Sourcing Unit (RSU) meets with the recruiters monthly. HRD sponsors a joint Annual Recruitment Conference for recruiters and hiring managers and an additional

annual conference for hiring managers specifically.

## 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 FBI's HRD has designated an HR Specialist within RSU to handle external queries related to disability hiring. This is currently a PT duty for her and represents roughly 10% of her time. The FBI's long-term goal would be to have an HR Specialist able to devote 50% of their time to PWD.

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	
Special Emphasis Program for PWD and PWTB	1	0	14	Vanessa Banks Program Manager vwbanks@fbi.gov
Processing applications from PWD and PWTB	0	0	1	Tracy Klein Human Resources Specialist tklein@fbi.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Tracy Klein Human Resources Specialist tklein@fbi.gov
Processing reasonable accommodation requests from applicants and employees	4	0	0	Lauren Smith Disability Program Manager Lsmith3@fbi.gov
Section 508 Compliance	4	0	0	Jerome Duiguide APO Lead jduiguide@fbi.gov
Architectural Barriers Act Compliance	0	0	0	

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

No additional training for HRD staff this year, though we did provide training on schedule A, the FBI's hiring flexibilities, etc. to RSU in previous years.

**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

Although the FBI does fund requested recruiting events, there are insufficient resources to devote a full-time person to recruiting and hiring of PWD.

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

<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.		
<b>Objective</b>	Post PAS procedures on public website.		
<b>Target Date</b>	Sep 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		Post PAS procedures on public website.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019 2018	The FBI continued to work to get PAS procedures finalized and posted. The FBI is currently drafting PAS procedures which will be included with an updated RA SOP and submitted to the EEOC for approval once approved by the FBI.	

<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)]		
<b>Objective</b>	The EEO Officer will meet with Human Resources Division Assistant Director to make a request for exit interviews that implement questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.		
<b>Target Date</b>	Dec 31, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2020		Suggest exit interviews/surveys and appropriate questions.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	In FY18, the FBI identified the lack of these questions in exit interviews/surveys.	

**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.

Each of the 56 field offices developed a Field Office Recruitment Plan where they identified colleges, advertisement opportunities, and organizations in their area of responsibility to recruit PWD. RSU currently advertises on Sports N Spokes, disabledperson.com, and jofdav.com to recruit PWD.

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

The legal hiring authority for the FBI is Title 28, United States Code, Part II, Chapter 33 and Section 536. All positions in the FBI are excepted from competitive service and all positions are in the excepted service. The FBI does not use Schedule A or D because our entire component is excepted service. As an excepted service agency, the FBI can mission critically hire individuals into permanent positions with the appropriate qualifications and certifications.

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.

An FBI representative is listed on OPM's website page "Disability Empowerment" as the Selective Placement Program Coordinator. Resumes are forwarded to the FBI's representative and these individuals are telephonically contacted to further establish interest and to be provided information on how their resumes will be shared with the FBI's hiring managers for possible employment consideration. Monthly hiring managers are contacted to review the resumes on the share point site.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

The HRD AD hosts a call with all of the FBI's hiring managers regarding the hiring goals of the FBI. Disability hiring is taken into consideration in the FBI hiring plans and recruitment efforts. Hiring managers understand the FBI's hiring authorities and understand that if they identify and otherwise qualified candidate for a position, who is a PWD or PWTD, they have the ability to hire them directly into the position. The RSU is also working on providing additional guidance to hiring managers on how to select, interview and supervise PWD/PWTD, in efforts to create a better understanding of and remove barriers to selection and consideration.

## 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 FBI works with Operation War Fighter to hire disabled veterans.

## C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

b. New Hires for Permanent Workforce (PWTD) Answer No

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at

the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

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

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## 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 Human Resources Branch (HRB), Office of Diversity and Inclusion, provides diversity training including NEW Inclusion Quotient and Bias for Decision Makers training to help employees and supervisors manage diversity of our workforce and recognize and develop talent.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

HRD, OWD provides various tools, resources and training, to all FBI employees to enhance the selection, retention, and performance of the workforce. We also offer Temporary Duty Assignments to expand employees' knowledge and skillsets.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs						
Mentoring Programs	590	516	14%	13%	1.2%	1.2%
Other Career Development Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Internship Programs	11051	1170				

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer No
- b. Pay Increases (PWTD) Answer No

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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.



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

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

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19,

approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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 N/A

ii. Internal Selections (PWD) Answer N/A

b. Managers

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer N/A

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

a. Executives

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

ii. Internal Selections (PWTD) Answer N/A

b. Managers

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

ii. Internal Selections (PWTD) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWTD) Answer N/A

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information

to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

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

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

The legal hiring authority for the FBI is Title 28, United States Code, Part II, Chapter 33 and Section 536. All positions in the FBI are excepted from competitive service and all positions are in the excepted service. The FBI does not use Schedule A or D because our entire component is excepted service. As an excepted service agency, the FBI can mission critically hire individuals into permanent positions with the appropriate qualifications and certifications.

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

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.
  - a. Voluntary Separations (PWTD) Answer No
  - b. Involuntary Separations (PWTD) Answer No

In FY17, the FBI launched a new system to more effectively capture disability status in the workplace, beyond what was declared at the time of hire, and allow an employee to change their status should their disability status change over time. As of FY19, approximately 56% of the workforce has utilized this system. For all questions noted, the FBI does not yet have enough information to determine if there is a trigger, i.e. a disparity between PWD in the workforce and persons without disabilities in each instance.

Separations	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.

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**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

The FBI maintains a public facing, accessible website ([www.FBI.gov/accessibility](http://www.FBI.gov/accessibility)) explaining to individuals with disabilities with authorization to access and use FBI systems and inform them of their rights vis-à-vis Section 508 of the Rehabilitation Act. The FBI also maintains a public-facing e-mail address ([FBI\\_Accessibility@fbi.gov](mailto:FBI_Accessibility@fbi.gov)) and mailbox, and identifies a physical mailing address and phone number for individuals with disabilities to contact the FBI regarding inaccessible information and communication technology (ICT) when encountered.

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

The EEO Officer meets with the Assistant Director's of the Human Resources and the Facilities Divisions to ensure any identified barriers are mitigated. The Finance and Facilities Division, Architectural and Engineering Services Unit, ensures compliance with their designs. The Department of Justice has the process to file an ABA complaint posted on its website ([www.justice.gov/jmd/complaint-processing](http://www.justice.gov/jmd/complaint-processing)). Complaints about inaccessibility of DOJ buildings or facilities should be made directly to the U.S. Access Board.

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 authorities of the FBI Office of the Chief Information Officer (OCIO) and its Section 508 Accessibility Program Office (APO) implement, manage, and maintain an enterprise-wide accessibility compliance program established under DOJ Order 0902 (rev. 5/2016) and FBI Policy Directive 0919 (11/20/2016 - currently pending review). Correspondingly, the FBI APO provides guidance, oversight, and the resources necessary to ensure the FBI's Information and Communication Technology (ICT) is accessible and usable for individuals with disabilities. The APO established a myriad of guides, plays, and practices that have improved ICT accessibility, including: an accessibility testing guide and checklists; training on creating accessible documents; intranet portals for receiving, tracking, and adjudicating exception requests and complaints; and the insertion of specific Section 508 compliance language into procurement systems and documents to ensure accessible ICT acquisitions. The Section 508 APO collaborates with sister agencies of the Intelligence Community (IC) and the DOJ Section 508 Coordinator Office, the GSA Accessibility Program Managers and other Executive agencies, sharing best practices and innovative approaches to improving accessibility for our employees and citizens. FY19 Highlights: - Established an FBI OCIO Accessibility Committee (AC), which serves as a governing body, providing oversight, auditing, guidance, and facilitates adherence of the FBI to Section 504 and 508 legislated mandates. The OEEOA and OCIO co-chairs the AC and membership is enterprise wide. - Incorporated a Section 508 compliance review for all new IT hardware and software purchases. - Provided training to over 500 employees. - Purchased 18 automatic closed captioning devices (ACCD). The ACCDs eliminated the backlog of video pending closed captioning and the need to perform a manual closed captioning.

## 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.)

Based on data captured from FY19, the average processing time was 122 days. However, 49% of the requests were processed in 90 days or less. Processing time includes the initiation of request to implementation of the accommodation. Processing time was significantly impacted due to the Government Shutdown occurring from December 22, 2018, to January 25, 2019. During this time the interactive process was placed on hold until the government was reopened. Additionally, increased processing time can also be contributed to the letter review process. On average, the RA letter review takes 33 days from submission to recommendation/signature, with three levels of review for every accommodation. We are currently working to streamline this review process, including removing some levels of approval for less complex cases. (\*Please note: This number excludes the number of local accommodations, pending requests, and or the number of employees who withdrew a request throughout any point in the process) On September 20, 2019, the RA Program implemented an automated tracking system to improve data capture, record keeping and improve our timeliness. Enhancements include: a collaborative SharePoint database, automated workflow for document review, more meaningful status updates to our customers, and monthly dashboard reporting to management. This upgrade included converting the FY2019 data for more improved tracking purposes. Additionally, on June 24, 2019, the RA Program began utilizing the automated tracking system to follow recommendation letters through the letter review process.

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.

When reasonable accommodation requests are submitted directly to the RA Program (either in person, electronically or via fax/BuMail) for initial review, assignment, and processing, OEEOA attempts to engage in the interactive process immediately,

coordinate with supervisors and partners, and make a recommendation for each reasonable accommodation as expeditiously as possible. Some cases will require additional time to effectively process due to the need for medical documentation or coordination with the supervisors and/or management team of the requestor. (\*Please note: the FBI's RA Program is not centrally funded. Employing divisions are responsible for approving, identifying, procuring, and implementing actual accommodations - OEEOA tracks implementation and records results.) OEEOA also allows and encourages FBI Executive Management to make local accommodation (within the division) outside of the interactive process, which empowers managers to better support their employees, if deemed reasonable and effective for the division. We ask that Division management inform the RA Program of any accommodation(s), date of implementation, and effectiveness, so that the RA Program may track local accommodations centrally. Most recently, OEEOA developed and implemented standardized communications with templates and customer resources to provide all requestors. The information provides a detailed overview of the reasonable accommodation process and clearly defines the role of OEEOA, FBI, management and the requestor. This information allows management to take a more active role in ensuring their employees accommodations are being met in a timely manner. OEEOA continues to work toward securing an effective means to track accommodations for the purpose of trend analysis. OEEOA offers training to the whole of the FBI. On our website, employees and management may request training - tailored to their specific needs and interests - at any time. Further, we are full participants on the Persons with Disabilities Advisory Council (PDAC) who we have partnered with to host a number of joint training and Lync sessions related to the Ra Program. It is important to note, as the number of requests for accommodations has increased exponentially, the RA Program's policies have expanded and its procedures have been made more transparent. In FY2019 alone, our team of four RAPCs processed over 463 accommodation requests. We have also seen a significant spike in our requests for training. Because of these efforts, management across the agency is now forwarding us any medical documentation submitted for proper handling and storage. Additionally, because of training, managers feel more empowered to assist their employees in the interactive process. We tracked 48 local accommodations in which the employee and the supervisor coordinated an accommodation and sent the RA program a notification for tracking purposes. This is a 500% increase from FY2018.

## **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.

PAS requests are to be treated in the same manner as all other reasonable accommodation requests. However, OEEOA coordinates with HRD in efforts to implement any accommodation that requires PAS.

## **Section VII: EEO Complaint and Findings Data**

### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer No

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

Answer 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.

N/A - In FY19 the FBI settled 2 complaints alleging harassment based on disability status but there were no findings of discrimination.

**B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer No

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

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

N/A - In FY19 the FBI settled 3 complaints alleging failure to provide reasonable accommodation but there were no findings of discrimination.

**Section VIII: Identification and Removal of Barriers**

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

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

Answer No

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

Answer N/A

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

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

As noted above, the FBI has not previously had the ability to effectively identify PWD and PWTD in the organization beyond what was declared at entry, and no effective internal tracking of these individuals inside the organization for the kind of barrier analysis requested prior to FY17. Since FY17, the FBI has been working to encourage all employees to "Self-ID" in the system that effectively captures disability status in the workplace. As of FY19, approximately 56% of the workforce has "Self-ID'd". The remaining employees who have not "Self-ID'd" are needed to holistically capture and determine the number of PWD and PWTD.

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

N/A

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 FBI will continue to message the Self-ID Campaign and encourage employees to "Self-ID" in the system in order to effectively capture all current onboard employees' disability status and any changes that have occurred to employees' disability status over time. This system and subsequent data is connected to our HR Information System, which provides the FBI a better understanding

of our current workforce, however, additional data and employee information is needed in order to perform the requested barrier analysis.