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 FY 2019, PWD accounted for 26.4 percent of all permanent employees at the GS-1 to GS-10 grade-level cluster; and for 16.21 percent of all permanent employees at the GS-11 to SES grade-level cluster. Both figures exceed the 12 percent benchmark. Workforce participation rates include 30 percent or more disabled veterans not indicating a disability, and individuals who chose not to identify their specific disability.

*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   Yes

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

In FY 2019, for the GS-1 to GS-10 cluster, PWTD workforce participation was 1.96 percent. For the GS-11 to SES cluster, PWTD workforce participation was 0.57 percent, which falls below the EEOC benchmark goal of two percent. This figure, however, does not account for PWTD employees hired through 10-point Veteran's Preference based on a service-connected disability that did not elect to identify their disability. In FY 2019, 2,929 (5.46%) of DOT employees on board received 10-point Veteran's Preference for 30 percent or more compensable disability, but did not identify as a person with a disability on the SF-256 form. This figure also does not include employees who declined to identify their specific disability.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical 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.

DOT issued an agency-wide memorandum in 2011 and again in 2014 communicating specific numerical goals for DOT and each Operating Administration (OA). These numerical goals are incorporated into DOT's 2017-2019 Human Capital Operating Plan. These recruitment activities are evaluated by the OAs' Offices of Human Resources. The information is communicated throughout DOT. Workforce statistical data reports are provided to hiring managers and supervisors.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer   Yes

DOT meets these requirements by having its Disability Resource Center (DRC) (https://www.transportation.gov/drc/disability-resource-center), disability employment managers, a Departmental selective placement program manager, and Schedule A Hiring Coordinators at each OA. The department also has full-time staff to assist applicants, process reasonable accommodation requests, manage special emphasis programs for persons with disabilities, and ensure compliance with the Architectural Barriers Act and Section 508 of the Rehabilitation Act for accessible communication technology.

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	4	0	0	Jason Nelson Chief jason.nelson@dot.gov
Special Emphasis Program for PWD and PWTD	3	0	11	Annette Carr Disability Program Manager annette.carr@dot.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Alison Levy Manager alison.levy@dot.gov
Section 508 Compliance	1	0	3	Larry Slaughter Section 508 Program Coordinator larry.slaughter@dot.gov
Architectural Barriers Act Compliance	5	0	0	Yvonne Medina Director yvonne.medina@dot.gov
Processing applications from PWD and PWTD	4	0	0	Jason Nelson Chief jason.nelson@dot.gov

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

Answer   Yes

The Departmental Office of Civil Rights provides model EEO program skill efforts. Additionally, in FY 2019, DOT staff of Office of Civil Rights continued to provide comprehensive reasonable accommodations training to managers throughout DOT. The DRC provides training on Schedule A hiring to OAs. At the OA level, in FY 2019, the disability program staff in the FAA received training on the following topics: Reasonable Accommodation; Reasonable Accommodations Data Management; Ensuring a Model EEO Program; Hiring Persons with Disabilities; Conflict Resolution; Prevention of Workplace Bullying; Rethinking Diversity and Inclusion; and Social Media Harassment. At FHWA, all Human Resources Specialists and managers are required to complete the Veteran Employment Training for Human Resource Professionals, which also includes information on the use of Schedule A hiring authorities. FRA provides a series of trainings to its employees on civil rights, hiring employees with disabilities, fair employment, and professional development topics.

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

DOT funds the Agency's DRC, which manages centralized interpreting services and personal assistance services for any applicant or employee with a disability located across the United States. Additionally, the DRC continues to partner with the Department of Defense's Computer/Electronic Reasonable Accommodation Program to support the purchase of some of DOT's reasonable accommodations.

Section III: Program Deficiencies In The Disability Program

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

DOT utilizes a Selective Placement Program Manager, Schedule A Coordinators in Operating Administrations, Human Resources Specialists, and designated recruitment teams to identify and recruit applicants with disabilities using the strategies below. - DOT presence at job and career fairs for persons with disabilities. People with disabilities and disabled veterans are included as part of the recruitment teams. University and college offices for students with disabilities, in addition to career services offices, are contacted for recruitment purposes. - Utilization of public, private, and non-profit entities to include the Department of Labor's Employer Assistance and Resource Network; state and local vocational rehabilitation agencies and employment offices; the Office of Personnel Management's Shared List of People with Disabilities; the Workforce Recruitment Program database; the Department of Veterans Affairs, Wounded Warrior Office and Vets 2 Feds; military installations and transition offices; Department of Defense, Operation Warfighter Program; the National Naval Officers Association; and disability-related advocacy organizations whose primary focus is working to employ people with disabilities. - The DOT Executive Agent has a standard list of professional organizations and academic institutions that automatically receive a copy of all job announcements posted via USAJobs. - As noted above, DOT has established a departmental recruitment council. The Council will develop a departmental recruitment plan that will align with the agency's Human Capital Operating Plan, which includes benchmarks for recruitment and hiring of persons with disabilities and targeted disabilities.

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 agency and staff Draught Schedule A hiring authority. Additionally, DOT uses the Veteran hiring Process. In FY 2019, the agency includes veterans with service-connected disabilities. In FY 2019, 11.67 percent of new hires were veterans who claimed preference based on a service-connected disability.

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

All vacancies that are advertised "government-wide" and "all sources" include a statement on People with Disabilities and consideration under special appointing authorities. Eligibility criteria are addressed on open competitive vacancy announcements to educate those candidates unfamiliar with application procedures, forms, and requirements. Additionally, reasonable accommodation statements are included on vacancy announcements to notify applicants with disabilities. Applicants who meet the job qualifications are referred to hiring managers on a non-competitive certification list. Human Resources Specialists discuss with hiring officials the use of hiring flexibilities, non-competitive appointment authorities to include Schedule A and disabled veterans' appointments. Additionally, people with disabilities can send their resumes to the DOT Selective Placement Coordinator.

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

DOT maintains the Disability Program website (https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/people-disabilities), which is a resource for job applicants and human resources professionals. Additionally, DOT has an internal resource (http://dotnet.dot.gov/worktools/hiringreform/howtohire/jobanalysisoverview/wiki%20pages/hiring%20people%20with%20disabilities.html) for managers to use in hiring people with disabilities. Additional resources include the DOT policy on Reasonable Accommodations and DOT hiring tool kit for managers.

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.

See answer for A.4 in Section III

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

Among FY 2019 new hires for the permanent workforce, a trigger exists for PWTD (1.19%), which falls below the two percent benchmark for PWTD. As noted above, this figure does not account for PWTD employees hired through 10-point Veteran's Preference based on 30 percent or more compensable disability that did not elect to identify as a person with a targeted disability, or individuals who elected not to disclose their specific disability. In FY 2019, DOT hired 239 employees who received 10-point Veteran's Preference for a 30 percent compensable disability who did not identify as a person with a disability on the SF-256 form.

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   No

        b. New Hires for MCO (PWTD)   Answer   Yes

In FY 2019 the Department identified triggers for new PWTD hires in the following MCOS: 0343, Management/Program Analyst: qualified applicants=4.72%; hires=1.45% 0810 Civil Engineering: qualified applicants=2.11%; hires=0.77% 2101, Transportation Specialist: qualified applicants=2.96%; hires=1.71% 2123, Motor Carrier Safety: qualified applicants=2.84%; hires=0% 2152, Air Traffic Control: qualified applicants=0.41%; hires=0.29%

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

In FY 2019 the Department identified triggers for PWD internal applicants in the following MCOS: 0861, Aerospace Engineering: Applicant pool=4.92%; qualified applicants=1.96% 1825, Aviation Safety: Applicant pool=11.88%; qualified applicants=3.62% 2123, Motor Carrier Safety: Applicant pool=5.6%; qualified applicants=1.9% 2152, Air Traffic Control: Applicant pool=2.95%; qualified applicants=2.26% Additionally, in FY 2019 the Department identified triggers for PWTD internal applicants in the following MCOs: 2123, Motor Carrier Safety: Applicant Pool=1.12%; qualified applicants=0.5%

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   No

        b. Promotions for MCO (PWTD)   Answer   Yes

In FY 2019 the Department identified triggers in for PWTD promotions in the following MCOs: 0801, General Engineer: qualified applicants=1.26%; promoted=0.89% 0861, Aerospace Engineer: qualified applicants=0.49%; promoted=0% 1825, Aviation Safety: qualified applicants=0.9%; promoted=0% 2151, Air Traffic Control: qualified applicants=0.56%; promoted=0.43%

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.

DOT encourages and provides training and career development opportunities for all employees, including those with disabilities. Employees are notified of developmental and training opportunities via venues such as the Temporary Developmental Assignment Clearinghouse, The Learning Highway, Career Advancement Webinar Series, Webinar Libraries, Training and Development email systems, Employee Awareness Programs, and the Learning Management System. Employee Resource Groups also share information with their members on available career development opportunities. Promotion opportunities are posted on internal Staff Net sites, USAJOBS, and emails are sent to employees and agency employee resource groups with links to vacancy announcements on USAJOBS. Advertisements for training and workshops include language on reasonable accommodations. All marketing and promotional materials designed to inform DOT of training and professional development are 508-compliant. The Department created a DOT-wide mentoring program that incorporates diversity and inclusion. Online learning opportunities are accessible to all DOT employees through the Department's eLearning System. The DOT manages an executive coaching program that offers individual and team coaching for GS-15 and SES employees. Additionally, the Department developed a comprehensive, automated Hiring Toolkit for Hiring Managers and HR Specialists, which clearly delineates each step of using the Schedule A and other special hiring authorities, and continues to be utilized by the agency. The Department has also developed a series of Career Path Guides that employees can access and utilize to identify the competencies required for success in various DOT occupational fields, including mission critical occupations.

B. CAREER DEVELOPMENT OPPORTUNITES

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

DOT continues to promote and create career opportunities for all DOT administrative personnel for GS-9 and below employees to include career counseling, workshops on mentoring, interviewing, resume writing, and professional imaging. Additionally, DOT has developed a career path guide that is available to all employees. This guide outlines the various pathways available for career advancement at DOT, the necessary core and technical competencies, and information on developmental experiences. DOT also provides career development opportunities through the General Engineer Fellows Program and the American University Aspiring Fellows Program.

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	247	58	2.02%	8.21	0%	0%
Fellowship Programs	5	1	20%	100%	20%	100%
Mentoring Programs	114	114	5.26%	5.26%	1.75%	1.75%
Coaching Programs	70	70	10%	1.43%	10%	1.43%
Training Programs	541	487	12.5%	10.18%	0%	0%
Detail Programs	8	7	12.5%	10.18%	0%	0%
Other Career Development Programs	451	393	9.09%	10.18%	2.88%	3.05%

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   Yes

      b. Selections (PWD)   Answer   Yes

> Based on the available demographic information for career development programs, in FY 2019 DOT identified possible triggers for PWD among applicants and selectees for internships, coaching programs, mentoring programs, training, and "other" programs. Additionally, DOT identified triggers for PWD among selectees for career development opportunities, except fellowship programs.

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   Yes

      b. Selections (PWTD)   Answer   Yes

> Based on the available demographic information for career development programs, in FY 2019 DOT identified possible triggers for PWD among applicants and selectees for internships, mentoring programs, and detail programs.

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

> Based on the agency inclusion rate, PWD (16.49%) and PWTD (18.35%) received 1-9 hour time-off awards at comparable rates as non-PWD (20.5%) employees, and as the total permanent workforce (19.96%) in FY 2019. Similarly, PWD (14.6%) and PWTD (13.95%) received time-off awards of greater than nine hours at comparable rates to non-PWD (10.79%) employees, and the total permanent workforce (11.35%) in FY 2019. Furthermore, based on the agency inclusion rate, PWD (17.71%) received cash awards of less than $500 at similar rates as non-PWD employees (17.65%) and the total permanent workforce (17.61%) in FY 2019, while PTWD (14.47%) had comparable rates. PWD (32.64%) and PWTD (33.33%) received cash rewards over $500 slightly more frequently than non-PWD employees (28.38%) and the total permanent workforce (29.02%).

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

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

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

      a. Pay Increases (PWD)   Answer   No

      b. Pay Increases (PWTD)   Answer   No

> Based on the agency inclusion rate, in FY 2019 PWD (0.62%) and PWTD (1.03%) received quality step increases at slightly higher

rates to non-PWD employees (0.4%) and the total workforce (0.44%). Furthermore, PWD (41.38%) employees received SES performance awards at similar rate to non-PWD employees (44.41%) and to the total SES workforce (43.78%) in FY 2019, while PWTD (100%) received these awards at a higher rate than the non-PWD and total SES workforce.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

      a. Other Types of Recognition (PWD)   Answer   N/A

      b. Other Types of Recognition (PWTD)   Answer   N/A

D. PROMOTIONS

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

      a. SES

           i. Qualified Internal Applicants (PWD)   Answer   No

           ii. Internal Selections (PWD)   Answer   Yes

      b. Grade GS-15

           i. Qualified Internal Applicants (PWD)   Answer   No

           ii. Internal Selections (PWD)   Answer   No

      c. Grade GS-14

           i. Qualified Internal Applicants (PWD)   Answer   No

           ii. Internal Selections (PWD)   Answer   No

      d. Grade GS-13

           i. Qualified Internal Applicants (PWD)   Answer   No

           ii. Internal Selections (PWD)   Answer   No

Senior Grade Level % Applicant Pool % of Qualified Internal Candidates Trigger? % of Selections Trigger? GS-13 5.58% 5.84% No 24.52% No GS-14 2.78% 3.10% No 17.10% No GS-15 4.57% 6.39% No 13.00% No SES 4.11% 4.14% No 0.00% Yes

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   No

    ii. Internal Selections (PWTD)   Answer   Yes

d. Grade GS-13

    i. Qualified Internal Applicants (PWTD)   Answer   No

    ii. Internal Selections (PWTD)   Answer   Yes

Senior Grade Level % of applicant pool Qualified Internal Applicants Trigger? % of Selections Trigger? GS-13 3.26% 3.31% No 1.82% Yes GS-14 1.25% 1.07% Yes 1.53% No GS-15 3.43% 3.29% Yes 1.21% Yes SES 4.11% 1.27% Yes 0.00% Yes In FY 2019 no internal candidates selected for SES level positions identified as a PWTD. PWTD internal selections for GS-13 and GS-15 grade-level positions fell below the identified benchmark of qualified internal applicants. PWTD hires do not include 30%+ disabled veterans who did not indicate a disability, or individuals who elected not to identify their specific disability or medical condition ("unidentified" responses on the SF-256 self-identification form)

---

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

    a. New Hires to SES (PWD)   Answer   No

    b. New Hires to GS-15 (PWD)   Answer   No

    c. New Hires to GS-14 (PWD)   Answer   No

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

Grade Level % of Qualified PWD % of PWD Hires Trigger? Candidates GS-13 6.41% 26.45% N GS-14 5.23% 33.14% N GS-15 5.02% 19.23% N SES 5.69% 11.54% N PWD hires include 30%+ disabled veterans not indicating a disability and individuals who chose not to identify their specific disability

---

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

    a. New Hires to SES (PWTD)   Answer   No

    b. New Hires to GS-15 (PWTD)   Answer   No

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

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

Grade Level % of PWTD Qualified Applicants % of Hires Trigger? GS-13 2.82% 2.17% No GS-14 2.37% 2.33% No GS-15 2.57% 0.00% Yes SES 2.94% 3.85% No In FY 2018, no new hires at the GS-15 grade level or for SES positions self-identified as a PWTD. PWTD Hires at the GS-13 and GS-14 grade levels were below the identified benchmark. PWTD hires do not include 30%+ disabled veterans who did not indicate a disability, or individuals who elected not to identify their specific disability or medical condition ("unidentified" responses on the SF-256 self-identification form).

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

   a. Executives

   i. Qualified Internal Applicants (PWD)   Answer   No

   ii. Internal Selections (PWD)   Answer   No

   b. Managers

   i. Qualified Internal Applicants (PWD)   Answer   No

   ii. Internal Selections (PWD)   Answer   No

   c. Supervisors

   i. Qualified Internal Applicants (PWD)   Answer   No

   ii. Internal Selections (PWD)   Answer   No

Category % of Applicant Pool % of Qualified Internal Applicants Trigger? % of Selections Trigger? Supervisor 8.12% 14.71% N 24.52% N Manager 4.62% 3.50% Y 16.07% Y Executives 4.11% 4.14% N 0.00% N PWD promotions include 30%+ disabled veterans not indicating a disability and individuals who chose not to identify their specific disability.

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   No

   ii. Internal Selections (PWTD)   Answer   No

Category % of applicant pool Qualified Internal Applicants Trigger? % of Selections Trigger? Supervisors 0.86% 1.04% N 1.80% N Managers 2.3% 2.43% Y 1.45% Y Executives 4.21% 1.27% Y 0.00% Y In FY 2019 the share of PWTD qualified applicants and selections to supervisory, managerial and executive positions fell below the identified benchmarks.

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

a. New Hires for Executives (PWD)	Answer	No
b. New Hires for Managers (PWD)	Answer	No
c. New Hires for Supervisors (PWD)	Answer	No

Category % Qualified Applicants % of Selections Trigger? Supervisors 4.17% 19.93% N Managers 5.31% 21.43% N Executives 5.81% 11.54% N

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

Category % Qualified Applicants % of Selections Trigger? Supervisors 2.65% 2.17% Y Managers 2.73% 1.79% Y Executives 3.11% 3.85% N

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	Yes

Based on the inclusion rate, in FY 2019, the voluntary separation rate for PWD (2.99%) was lower than that of employees without a

disability (3.62%). The PWD involuntary separation rate (4.71 %) exceeded the non-PWD involuntary separation rate (3.33%) in FY 2019. PWD counts include 30%+ disabled veterans not indicating a disability and individuals who chose not to identify their specific disability.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %

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

   a. Voluntary Separations (PWTD)   Answer   Yes

   b. Involuntary Separations (PWTD)   Answer   Yes

Based on the inclusion rate, in FY 2019, the voluntary separation rate for PWTD (4.98%) exceeded that of employees without a targeted disability (3.62%). Additionally, the involuntary separation rate for PWTD (5.07%) exceeded that of employees without a targeted disability (3.33%).

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

FY 2019, exit interview data found that 11.6 percent of respondents self-identified as a person with a disability (PWD) and nearly two thirds of self-identified PWD respondents also identified themselves as a having a targeted disability. Exit survey results indicate that employee interactions was the most highly cited factor in respondents' decision to leave, with over half (55.7%) agreeing or strongly agreeing to this as a major consideration in their separation. Nearly half (48.1 %) of respondents indicated that the lack of fair treatment was a significant or highly significant factor in their decision to leave, while approximately one quarter (24.7%) cited EEO/workplace environment-related issues as a major reason for leaving. For respondents who left due to workplace environment issues-hostile work environment and resolution of EEO-related matters were the most cited concerns.

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.transportation.gov/accessibility

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

https://www.transportation.gov/mission/facility-accessibility

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 DRC provides technical assistance to DOT staff on issues related to accessible facilities and technology. DOT Headquarters was constructed with the goal of accessibility compliance with the Architectural Barriers Act and Access Board requirements. As DOT consolidates or moves to new workspaces, facility accessibility is a priority. The GSA assists with the DOT's space needs and with appropriate contractual lease language, when appropriate.

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 a review of data from the DOT Reasonable Accommodation Management System, initial requests for reasonable accommodations were processed in an average time frame of 21 business days per request in FY 2019.

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.

DOT Order 1011.1A: "Procedures for Processing Reasonable Accommodation Requests from Job Applicants and DOT Employees with Disabilities," establishes written procedures for the provision of reasonable accommodations for employees and applicants at the agency, including timely processing of requests as well as timely providing approved accommodations. The DRC provides reasonable accommodations to employees and job applicants. A delivery model of this type ensures fair and consistent outcomes throughout DOT. This program is funded through the Working Capital Fund with additional resources available through the Computer/Electronic Accommodations Program (CAP) for obtaining assistive technology and related training. To ensure the employee's success in using the identified product, training can also be provided by DRC. DRC provides services such as sign language interpreting and personal assistance services (PAS) through nationwide contracts. Staff interpreters are also available to provide interpreting services. DRC also provides captioning services and assistive technology-related trainings. DRC released an updated Version 2.0 of their Services Handbook in August 2018. Highlights of the updated handbook include: • Section 4.6, "Sign Language Interpreting," reflects changes to procedures brought about by the new nationwide interpreting services contract that took effect April 1, 2018. • A new Appendix has been added to include factors to consider when deciding whether to pay the sa.lary for an employee's own personal attendant while on travel. In FY 2019, DOT also began to update the departmental reasonable accommodation order to clarify roles and responsibilities for the decision-making process, include requirements to respond to public questions regarding reasonable accommodation, and incorporate requirements to ensure personal assistance services are available to. individuals who require such services as a reasonable accommodation.

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 DRC has provided Personal Assistance Services (PAS) since 2004. PAS are available to DOT employees throughout the United States. Currently, PAS is in place in for employees in Washington, D.C.; Cambridge, MA; Seattle, WA; and Atlanta, GA. The PAS are processed in the same manner as a reasonable accommodation. The employee requests the PAS by informing either his or her supervisor, human resources personnel, designated decision maker, other suitable DOT representative that he or she requires assistance with daily life activities because of a medical condition/targeted disability. The employee and/or Representative contacts the DRC to speak with a Reasonable Accommodation Analyst to begin the interactive process. Employees that are required to travel can utilize PAS via: • Nationwide contract: Services are procured through DRC's Nationwide contract, or • Invitational Travel:

employee has their own Personal Assistant (typically a spouse of family member). DRC has a PAS coordinator on-site at DOT Headquarters. This allows for easier handling of customer late/last minute PAS requests, and issues and complaints can be addressed quickly. DRC has updated its Handbook to reflect the expansion of their PAS to meet the revised requirements, as mentioned in Subsection C Question 2 of this section. The agency has also posted an FAQ on PAS on its public-facing website.

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?

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

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?

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

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.

In FY 2019 the agency had one finding of discrimination for harassment based on disability. The finding is currently on appeal. Additionally, in FY 2019 the agency issued its Policy Framework for the Prevention of Harassment. The program established in the policy is designed to address incidents or allegations of unlawful harassment under federal anti-discrimination laws, as well as inappropriate conduct that may not rise to the level of unlawful harassment but is often the basis for complaints and/or grievances. By the close of FY 2019 all of DOT's Operating Administrations drafted procedures to operationalize the Anti-Harassment Policy Framework, including the process of reporting and investigating harassment complaints. Beginning in FY 2020 harassment allegations raised in the EEO complaint process will also be addressed through the DOT Anti-Harassment Program established in the Department Policy Framework.

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?

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

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?

<div align="right">Answer   No</div>

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

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?	According to DOT's internal Exit Survey, people with targeted disabilities (PWfD) are more likely to separate than non-PWD employees because of fairness, management, and for discrimination-related reasons. According to the FY 2018 DOT Exit Survey data, self-identified PWD respondents (16.7%) were more likely than those who identified as non- PWD (3.2%) to "agree/strongly agree" that discrimination-related factors influenced their decision to leave. PWD respondents were also more likely (16.7%) than non-PWD respondents (4.3%) to agree/strongly agree that fairness, and specifically in terms of the work environment, contributed to their departure. PWD respondents were also more likely (33.3%) than non-PWD respondents (14.4%) to indicate management factored into their decision to leave the organization.
STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities

BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Retention; workplace environment conditions are leading PWD employees to voluntarily separate, including lack of career development and growth opportunities, ineffective communication from supervisors, greater employee recognition, and greater flexibility for telework.
Objective	Identify specific workplace issues related to fairness in the workplace that compel PWD employees to voluntarily separate, including educating employees and managers about available career development opportunities; and promoting awareness on executive communication skills and reasonable accommodation
Date Objective Initiated	Nov 1, 2018
Target Date For Completion Of Objective	Sep 30, 2020
Responsible Officials	Lisa Williams Director, DOHRM Charles E. James Director, DOCR

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Educate employees and supervisors on available career development opportunities	Yes		
09/30/2020	Educate managers and supervisors on effective communication with staff	Yes		

Fiscal Year	Accomplishments
2019	During FY 2019, the Department implemented a revised Departmental Employee Exit Survey instrument, to include detailed questions that inquire about PWD employee's experience at the agency, and whether their experience as a PWD influenced their decision to leave In FY 2019, the Department also developed and began providing educational presentations to supervisors on executive communication, to create awareness on how to effectively communicate with staff, as a means to reduce workplace conflicts and promote greater employee engagement The Department continued collect and analyze data on employee participation in competitive career development opportunities, to aid with educating employees on the various opportunities available to them. The DOCR and DOHRM worked with training and development staff through the DOT Recruitment Council in FY 2019 to emphasize the need to track participation in specific types of agency-offered opportunities, and provided technical assistance as needed.

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

Not applicable

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

The planned activities are designed to remove barriers for persons with targeted disabilities entering the DOT workforce. While the data suggests that the participation rate for persons with targeted disabilities has dropped from FY 2018 to FY 2019, as discussed above, that data may reflect under-reporting by hired disabled veterans on their SF-256 forms. Based on the hiring data available for veterans with service-connected disabilities hired through the Veterans' Preference process, 10.5 percent of FY 2019 hires claimed Veterans' Preference points for service connected disability of 30 percent or higher. From this data, we surmise that we are close to or are meeting our hiring goal for persons with targeted disabilities.

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.

Many of the described activities remained ongoing with a 2020 target date for completion.