

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

- | | |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer No |
| b. Cluster GS-11 to SES (PWD) | Answer Yes |

Source: Table B1: In FY19, PWD in GS 1-10 Cluster of the permanent workforce participate at 22.71%, a higher rate than the expected 12% benchmark, indicating no trigger. PWD in the GS 11 to SES Cluster participate at 9.46%, a lower rate than the expected 12% benchmark, indicating a trigger. (Source: Table B-4-1)

*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 |

Table B1: In FY19, PWTD in GS 1-10 Cluster of the permanent workforce participate at 8.42%, a higher rate than the expected 2% benchmark, indicating no trigger. PWTD in the GS 11 to SES Cluster participate at 2.0%, a rate equal to the expected 2% benchmark, indicating no trigger. (Table B-4-1)

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.

Through FY19, the Agency's numerical goals for hiring person with disabilities was shared via the Agency's quarterly Leadership Team Dashboard. This was specifically targeted toward managers and supervisors and is posted on the Agency's internal Website to provide access to all employees. In addition, the annual FHWA At-A-Glance report and All Employee Webinar briefing are used to share information on the Agency's workforce including the status of persons with disabilities. Also, all senior leadership members

receive the office profile for their organization biannually which includes information on the numerical representation of persons with disabilities and persons with targeted disabilities in their organizations. The Agency’s annual Workforce Plan includes a section on “Employment of Persons with Disabilities” that identifies the numerical goals and how the Agency did in meeting those goals.

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

- 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

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Marlo Moises Lead Human Resources Specialist
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Marlo Moises Lead Human Resources Specilaist
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kirsten Poston Disability Program Manager
Section 508 Compliance	1	0	0	Michelle Cribbs Transportation Specialist
Architectural Barriers Act Compliance	1	0	0	Jeffrey Baxter Associate Director of Facilities
Special Emphasis Program for PWD and PWTD	1	0	0	Kirsten Poston Disability Program Manager

- 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

All Human Resources Specialists and hiring 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. This information is tracked via the DOT's Learning Management System.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

Section III: Program Deficiencies In The Disability Program

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.

The FHWA has a multipronged approach to identify potential applicants with disabilities. This includes: • Participating in recruitment and outreach events that focus on the employment of persons with disabilities. In FY19, FHWA participated in 53 recruitment events in 24 States. Of those seven events were related to disability hiring. • Developing and maintaining relationships with disability organizations and colleges with disability offices. This allows FHWA to share information related to job opportunities which can be shared with their community. In some instances, these organizations have helped FHWA to post job announcements on their recruitment sites to be more visible. FHWA is using Handshake and Simplicity to post job opportunities. • The FHWA has launched a new Recruitment, Outreach and Diversity plan that focuses on increasing the number of applicants with disabilities in FHWA's applicant pool. To achieve this outcome the Agency intends to increase the number of hiring fairs targeting applicants with disabilities nationally. • 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. More specifically, FHWA has used the following recruitment sources as part of its outreach to have persons with disabilities apply for vacancies: • OPM's Shared List of People with Disabilities; the Workforce Recruitment Program database; State and local vocational rehabilitation agencies and employment offices; the U.S. Department of Veterans Affairs, Wounded Warrior Office and Vets 2 Feds; Military installations and transition offices. This list is not all encompassing but provides a broad view of the Agency's ongoing efforts.

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

FHWA utilizes appointing authorities to include Schedule A, Excepted Service, Veterans Recruitment Appointment and 30% or more Disabled Veterans. FHWA continues to work with the DOT Office of the Secretary on the establishment of the Warriors to the DOT program. FHWA was one of a just a few agencies within DOT to make a selection in support of this program. HR specialists provide information on these hiring flexibilities when contacted by hiring managers to fill a vacancy. The HR Specialist identifies which authority may meet the needs of the office and provides information on how to use the authorities if deemed appropriate.

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.

At FHWA, the HR Specialists work directly with hiring managers to use the non-competitive excepted service hiring authorities, including Schedule A. If a manager determines that a hiring authority that takes disability into account may be used, the HR Specialists provides specific information related to how applications are received and reviewed. This may include requesting resumes from the Agency’s Disability Resource Manager assigned to collect and share this information. In addition, Agency recruiters from around the country may be asked for points of contacts for veteran organizations to facilitate resume collection. FHWA receives and reviews resumes and determines whether the applicants are qualified for the position and whether the applicants submitted the necessary supplemental documents including Schedule A letters. Resumes and supplemental documents are then forwarded to the hiring manager. After the hiring manager completes interviewing of qualified candidates, he/she decides if the applicant can perform the job duties. The applicant must meet the qualification requirements, including specialized experience, for the position.

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

In FY19, the FHWA Office of Human Resources conducted Webinars on hiring veterans, disabled veterans and persons with disabilities for the HR Community as well as for the hiring managers. The FHWA Selective Placement Program Coordinator advised the HR Specialists on the Goals for FY19, as well as addressing workforce/succession planning needs. As positions become vacant, HR Specialists discussed the hiring flexibilities and options with hiring managers to reinforce the Agency’s commitment for employing a diverse workforce.

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 FHWA launched a new ROAD Team to conduct a review of organizations, colleges and universities, and other organizations that serve persons with disabilities and veterans. The organizations are contacted and provided information about FHWA, as well as the name and email of a dedicated resource to contact. The ROAD Team has participated in outreach to the disability employment organizations and outreach sources as well as conducting meetings with them to update resource information and to explore potential future partnerships. In FY19, FHWA attended seven recruitment events at colleges, universities, academic institutions, and professional associations that support populations of diverse recruitment candidates.

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 FY19, the new hire rate for FHWA PWD in the permanent workforce was 16.52%, a higher rate than the expected 12% benchmark, indicating no trigger. The new hire rate for FHWA PWTD in the permanent workforce is 4.35%, a higher rate than the expected 2% benchmark, indicating no trigger.

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

Applicants					
% of Qualified Applicants	0				
% of New Hires	0				

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

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

See Table on page 64 of the PDF version of the report.

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

See Page 65 of the PDF version of the report.

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

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

Please see page 65 of the PDF of the report.

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.

FHWA employees, including PWD and PWTd, are provided equal access to career development opportunities for advancement. Promotion opportunities are posted on FHWA’s internal StaffNet site, USAJOBS, and emails are sent to all employees with a link to the vacancy announcement on USAJOBS. The opportunity for advancement is the same for all employees. Career ladders are established based on the position and the needs of the office. This reduces any negative impact on PWD and PWTd.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The FHWA encourages and provides training and career development opportunities for all employees, including PWD and PWTd. Within the Office of Human Resources, the Agency has staff dedicated to the development of a catalog of professional and leadership opportunities. There is a focus on the leadership pipeline, however opportunities are provided for employees at all grade levels and across all job series. FY 2019 Webinars and trainings focused on the development of the Individual Developmental Plans to help employees take ownership of their personal development while understanding how their supervisors and assist them in reaching their goals. The FHWA also institutes a number of career development programs that support and prepare our Agency’s employees for enhanced performance and career advancement. These programs target employees at all levels in a variety of ways. The programs are as follows: PDP, FHWA 360 Degree Leadership Assessment, Discipline Support System, Is Supervision for Me?, Building the Foundation for Visionary Leadership, Career Advancement Webinar Series, DMC Women’s Forum Webinar Series, Critical Human Resources Skills, Formal Mentoring Program, Individual Development Plan Workshop, Launch Point, Leadership Competency Certificate Program, Leadership Development Academy, Management and Supervision Forum Webinar Series, Organizational Facilitation, Transportation Operations Academy Senior Management Program, and the Freight Academy 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	49	31	10.2	16.1	4.1	6.5
Fellowship Programs	5	1	20.0	100.0	20.0	100.0
Mentoring Programs	48	48	10.4	10.4	2.1	2.1
Coaching Programs	2	2	0.0	0.0	0.0	0.0
Training Programs	25	12	12.0	16.7	0.0	0.0
Detail Programs	6	5	16.7	0.0	0.0	0.0
Other Career Development Programs	432	389	9.3	10.0	3.0	3.1

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

- a. Applicants (PWD) Answer No
- b. Selections (PWD) Answer Yes

PWD were selected for training programs at a lower rate than they applied for Detail Programs, indicating a trigger. Of the six employees who applied for a detail assignment, one applicant was a person with a disability. The individual was not among those selected which indicates a trigger. The trigger resulting from the non-selection of one employee presents a questionable level of significance. For all other career development programs, PWD’s were selected at the same or higher rate indicating no trigger.

4. Do triggers exist for PWTd among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”,

describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

For all career development programs, PWTD’s were selected at the same or higher rate indicating no trigger.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

Please see page 68 of the reports PDF to see the table that explains this category.

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 Yes
- b. Pay Increases (PWTD) Answer No

Please see page 69 of the PDF of the report for the table explaining this category.

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

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

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

Please see page 69 of the PDF version of the report for explanation of this category.

D. PROMOTIONS

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

a. SES		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

See page 70-71 of the PDF version of the report for the table that explains this category.

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

a. SES		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

Please see page 71 of the PDF of the report for the table supporting these answers.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the

trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWD) Answer Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer No
- d. New Hires to GS-13 (PWD) Answer No

See page 72 of the PDF of the report to see the table reflected for this category.

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

- a. New Hires to SES (PWTD) Answer Yes
- b. New Hires to GS-15 (PWTD) Answer Yes
- c. New Hires to GS-14 (PWTD) Answer Yes
- d. New Hires to GS-13 (PWTD) Answer Yes

Please see page 73 of the PDF for this category

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

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

See page 73 on the PDF version of the report for explanation of this category.

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

- a. Executives
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer Yes
- b. Managers
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer Yes
- c. Supervisors
 - i. Qualified Internal Applicants (PWTD) Answer Yes
 - ii. Internal Selections (PWTD) Answer No

See page 74 of the PDF for the table that explains this category.

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

See table on page 75 of the PDF for the table that explains this category.

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

See page 75 of the PDF showing the table that explains this category.

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 No

All but one Schedule A employee was converted after 2 years of satisfactory service. Conversion is still being considered for the remaining employee, but has been delayed in an effort to resolve conduct and performance concerns prior to conversion.

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 Yes
- b. Involuntary Separations (PWD) Answer Yes

See page 77 of the PDF for the table that explains this category.

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

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer No

See page 77 of the PDF for the table that explains this category.

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

In analyzing the exit interview results and other data sources, the large majority of reasons why PWD and/or PWTD left the Agency was for family reasons, health reasons including medical hardships, and career promotional opportunities. A good number of employees also left the Agency due to retirement.

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 internet address on the Agency’s public Website regarding Section 508 of the Rehabilitation Act of 1973, including a description of how to file a complaint is 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.

The internet address on the Agency’s public Website regarding Architectural Barriers Act is www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards.

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.

Not Applicable.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

The Agency complies with the policy of processing requests within the 25-business day policy as set forth by the Department’s Order 1101.1A. FHWA processes reasonable accommodations requests within this time frame unless extenuating circumstances prevent it from doing so. Requests are processed through the Department’s Reasonable Accommodations Online Tracking System.

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.

During FY 19 the Agency worked with the Departmental Office of Civil Rights to revise and update DOT Order 1011.1B. The Department hosted several sessions of training on Reasonable Accommodations during FY 19. The Agency Disability Program Manager provided a training overview of the Reasonable Accommodations process to FHWA Leadership, and to several division offices. The Agency has completed a draft of the Reasonable Accommodations Handbook which is currently under internal review and expects to submit to EEOC in the later part of FY 20 for review and approval after the Department receives approval on their updated version of the DOT Order on Reasonable Accommodations.

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.

This is handled at the Departmental level.

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 Yes

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.

FHWA had no findings of discrimination in FY 19. FHWA settled cases involving, among other claims, those of harassment based on disability status. These cases were not considered to be ones where there was a substantial risk of an adverse finding on the harassment issue, and the cases were resolved without any admission of liability. Accordingly, no corrective measures were required on these claims.

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 Yes

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.

FHWA had no findings of discrimination in FY 19. FHWA settled cases involving, among other claims, those of reasonable accommodation. These cases were not considered to be ones where there was a substantial risk of an adverse finding on the reasonable accommodation issue, and the cases were resolved without any admission of liability. Accordingly, no corrective measures were required on the reasonable accommodation claims.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Individuals with targeted disabilities (PWTB) have a low participation rate in the FHWA workforce in grades GS13-SES.</p>											
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>											
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>												
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Reasonable Accommodation; FHWA needs to develop and market its written procedures for Reasonable Accommodations for FHWA employees</p>											
<p>Objective</p>	<p>The FHWA will analyze data regarding disability status reporting of preference eligible veterans to determine what, if any, outreach education should be developed to encourage identifying as a PWD/PWTB.</p> <table border="1" data-bbox="487 955 649 1092"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table> <p>The purpose of developing and implementing FHWA-specific reasonable accommodation procedures is to provide employees as well as supervisors and managers with an easy-to-understand, step-by-step explanation of the Reasonable Accommodation process. These procedures outline the steps for requesting or responding to requests for Reasonable Accommodation at FHWA.</p> <table border="1" data-bbox="487 1207 649 1344"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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<p>Responsible Officials</p>	<p>David Lewis Director of Human Resources</p> <p>Irene Rico Associate Administrator for Civil Rights</p>											
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>								
<p>09/30/2020</p>	<p>Educate hiring managers and HR Specialists on available hiring flexibilities to include Schedule A through the revamped and user-friendly hiring tool kit.</p>	<p>Yes</p>										
<p>09/30/2020</p>	<p>The FHWA will analyze data regarding disability status reporting of preference eligible veterans to determine what, if any, outreach education should be developed to encourage identifying as a PWD/PWTB.</p>	<p>Yes</p>										
<p>09/30/2020</p>	<p>Develop step by step procedures on the Reasonable Accommodations process in easy to use format for employees.</p>	<p>Yes</p>										

Fiscal Year	Accomplishments								
2018	2018 FHWA will report out updates and accomplishments in the FY 2019 and FY 2020 MD-715 report.								
2019	<p>Draft Reasonable Accommodations Handbook developed. It is currently undergoing internal review. Further progress will be reported out on in the FY 2020 report.</p> <p>In 2019, FHWA conducted a two-part Webinar on Schedule A Hiring and Reasonable Accommodations within the Agency’s Management and Supervisory Forum Webinar Series. The Management & Supervision Forum is a monthly Webinar series that provides learning opportunities for individuals who serve as supervisors, team leaders, and managers. It is part of the Office of Human Resources’ ongoing effort to give all employees the tools and information they need to chart their own course for performance improvement, learning, career development, as well as personal growth. The session provided participants with information that was designed to help them to:</p> <ul style="list-style-type: none"> • Understand how Schedule A works and the benefits of using this hiring authority. • Use available hiring tools to find qualified Schedule A candidates with disabilities. • Cite manager’s responsibilities in engaging the Reasonable Accommodations process • Recall the steps in the Reasonable Accommodations process • Follow the right order and appropriate steps in the Reasonable Accommodations process. <p>FHWA also conducts biannual Workforce planning conversations. Workforce Planning conversations are scheduled meetings between servicing HR specialists and organizational unit leaders (Division Administrators), which focus on workforce planning at the unit level rather than agencywide. The conversations provide an opportunity to discuss anticipated vacancies, possible separations and retirements, and hiring flexibilities, especially those that align with the Strategic Workforce Assessment. These strategic conversations are used to educate and highlight the Schedule A hiring flexibility. This process occurs every 2 years and last took place in 2018. The program will continue in FY 20.</p>								
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>									
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	Recruitment Practices; FHWA focuses recruitment on distributing competitive vacancy announcements.								
<p>Objective</p>	<p>The FHWA will analyze data regarding disability status reporting of preference eligible veterans to determine what, if any, outreach education should be developed to encourage identifying as a PWD/PWTD.</p> <table border="1" data-bbox="487 1249 779 1312"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> </table> <table border="1" data-bbox="487 1312 779 1396"> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table> <p>The purpose of developing and implementing FHWA-specific reasonable accommodation procedures is to provide employees as well as supervisors and managers with an easy-to-understand, step-by-step explanation of the Reasonable Accommodation process. These procedures outline the steps for requesting or responding to requests for Reasonable Accommodation at FHWA.</p> <table border="1" data-bbox="487 1512 779 1575"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> </table> <table border="1" data-bbox="487 1575 779 1659"> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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<p>Responsible Officials</p>	<p>David Lewis Director of Human Resources Irene Rico Associate Administrator for Civil Rights</p>								

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 hiring managers and HR Specialists on available hiring flexibilities to include Schedule A through the revamped and user-friendly hiring tool kit.	Yes		
09/30/2020	The FHWA will analyze data regarding disability status reporting of preference eligible veterans to determine what, if any, outreach education should be developed to encourage identifying as a PWD/PWTD.	Yes		
09/30/2020	Develop step by step procedures on the Reasonable Accommodations process in easy to use format for employees.	Yes		

Fiscal Year	Accomplishments
2018	2018 FHWA will report out updates and accomplishments in the FY 2019 and FY 2020 MD-715 report.
2019	<p>Draft Reasonable Accommodations Handbook developed. It is currently undergoing internal review. Further progress will be reported out on in the FY 2020 report.</p> <p>In 2019, FHWA conducted a two-part Webinar on Schedule A Hiring and Reasonable Accommodations within the Agency's Management and Supervisory Forum Webinar Series. The Management & Supervision Forum is a monthly Webinar series that provides learning opportunities for individuals who serve as supervisors, team leaders, and managers. It is part of the Office of Human Resources' ongoing effort to give all employees the tools and information they need to chart their own course for performance improvement, learning, career development, as well as personal growth. The session provided participants with information that was designed to help them to:</p> <ul style="list-style-type: none"> • Understand how Schedule A works and the benefits of using this hiring authority. • Use available hiring tools to find qualified Schedule A candidates with disabilities. • Cite manager's responsibilities in engaging the Reasonable Accommodations process • Recall the steps in the Reasonable Accommodations process • Follow the right order and appropriate steps in the Reasonable Accommodations process. <p>FHWA also conducts biannual Workforce planning conversations. Workforce Planning conversations are scheduled meetings between servicing HR specialists and organizational unit leaders (Division Administrators), which focus on workforce planning at the unit level rather than agencywide. The conversations provide an opportunity to discuss anticipated vacancies, possible separations and retirements, and hiring flexibilities, especially those that align with the Strategic Workforce Assessment. These strategic conversations are used to educate and highlight the Schedule A hiring flexibility. This process occurs every 2 years and last took place in 2018. The program will continue in FY 20.</p>

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

FHWA is targeting a 09/30/2020 as a completion date for the objectives listed above.

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

FHWA will report out progress and updates for the upcoming FY 20 MD-715 Report.

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.

FHWA will report out progress and updates for the upcoming FY 20 MD-715 Report.