

## 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 (PWT), 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    Yes |
| b. Cluster GS-11 to SES (PWD)  | Answer    Yes |

There are currently no employees with disabilities working at the Commission.

\*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 PWT 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 (PWT) | Answer    Yes |
| b. Cluster GS-11 to SES (PWT)  | Answer    Yes |

There are currently no employees with disabilities working at the Commission.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The Denali Commission is a small agency consisting of 14 permanent employees. Our Senior Management Team, which is involved in all our hiring, is aware that we do not meet the federal requirements for PWD and PWT. The numerical goals have been communicated verbally.

### 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

---

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	1	0	Bureau of Fiscal Service
Architectural Barriers Act Compliance	1	0	0	John Whittington Direct: 907-271-1414
Answering questions from the public about hiring authorities that take disability into account	1	0	0	John Whittington Direct: 907-271-1414
Special Emphasis Program for PWD and PWTD	0	0	0	n/a
Processing reasonable accommodation requests from applicants and employees	0	0	1	Elinda Hetemi Direct: 907-271-3415
Section 508 Compliance	1	0	0	John Whittington Direct: 907-271-1414

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

BFS staff has sufficient training to carry out their responsibilities during the reporting period, including reviewing the PD of open positions and sending the Commission resumes of qualified Schedule A individuals for potential hiring.

## 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

The Commission funds our shared services agreement with BFS.

## Section III: Program Deficiencies In The Disability Program

<b>Brief Description of Program Deficiency</b>	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR § 1614.203(d)(3)]
<b>Brief Description of Program Deficiency</b>	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR § 1614.203(d)(6)]
<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.
<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR § 1614.203(d)(1)(iii)(C)]
<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR § 1614.203(d)(4)] If yes, please provide the internet address in the comments.
<b>Brief Description of Program Deficiency</b>	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]

## 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 Commission funds our Shared Services Agreement with BFS. Through that agreement BFS leverages programs and resources, including Schedule A, to identify job applicants 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 Commission funds our Shared Services Agreement with BFS. Through that agreement, BFS leverages programs and resources, including Schedule A, to identify job applicants with disabilities and targeted disabilities.

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

BFS sends us all the resumes of qualified Schedule A individuals who have indicated a desire to work in Alaska.

- 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 N/A

We do not need to use special hiring authority for hiring PWT or PWD. Our enabling statute gives us the even broader authority to hire people without the regard to the civil service laws and regulations. Our general counsel ensures that our Federal Co-Chair (the Commission’s “hiring manager”) knows of our expanded hiring authority.

## 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 PWT, in securing and maintaining employment.

BFS has established contacts with organizations that assist PWD and PWT.

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

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

a. New Hires for Permanent Workforce (PWD) Answer Yes

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

The Commission does not meet the benchmarks.

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

- Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWT 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 (PWT) Answer Yes

No PWTs were hired in FY 19.

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 PWTM among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

We had no internal applicants in FY 19.

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

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

The Commission is an agency with 15 people. Every position is one-deep. There is no progression within a career field.

## 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 PWTM, have sufficient opportunities for advancement.

The Commission is an agency with 15 people. Every position is one-deep. There is no progression within a career field.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Commission is an agency with 15 people. Every position is one-deep. There is no progression within a career field.

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		PWTM	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0

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

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer N/A

The Commission is an agency with 15 people. Every position is one-deep. There is no progression within a career field. Therefore, there are no career development 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 N/A

b. Selections (PWTD)

Answer N/A

The Commission is an agency with 15 people. Every position is one-deep. There is no progression within a career field. Therefore, there are no career development 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)
- b. Awards, Bonuses, & Incentives (PWTD)

Answer No

Answer No

The Commission does not have employees who self-identify as having a disability.

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.

The Commission does not have employees who self-identify as having a disability.

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

The Commission does not have employees who self-identify as having a disability.

## 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      No
  - 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

The Commission does not have employees who self-identify as having a disability.

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

The Commission does not have employees who self-identify as having a disability

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

The Commission does not have employees who self-identify as having a disability

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWT 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 (PWT)  
Answer No
- b. New Hires to GS-15 (PWT)  
Answer No
- c. New Hires to GS-14 (PWT)  
Answer No
- d. New Hires to GS-13 (PWT)  
Answer No

The Commission does not have employees who self-identify as having a disability

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

The Commission does not have employees who self-identify as having a 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    No  
ii. Internal Selections (PWTD)                                  Answer    No

b. Managers

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

c. Supervisors

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

The Commission does not have employees who self-identify as having a disability

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

The Commission does not have employees who self-identify as having a disability

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 No
- b. New Hires for Managers (PWTD)                          Answer No
- c. New Hires for Supervisors (PWTD)                          Answer No

The Commission does not have employees who self-identify as having a disability

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer N/A

The Commission does not have employees pending conversion under Schedule A.

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

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

There were no PWD or PWTD employees in our workforce during FY 19.

Separations	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 No
- b. Involuntary Separations (PWTD)                          Answer No

There were no PWD or PWTD employees in our workforce during FY 19.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
-------------	---------	-------------------------	---------------------------------

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

There were no PWD or PWT employees in our workforce during FY 19.

## 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.

www.denali.gov

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.denali.gov/architectural-barriers-act/>

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 Commission's facilities and technology are accessible. The senior management team reviewed our facilities and technology and determined no change was needed.

## 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.)

1 week.

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.

We had one request, which was responded to within 5 business days.

## 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 Commission does not currently have PAS procedures but will develop them in FY 21.

## 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 No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

n/a

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

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

n/a

## 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

<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Less than expected participation of PWD and PWTDS
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities

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

N/A
-----

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

n/a
-----

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A
-----